

# 

#### 5

What is the Ethics Charter?

### 7

Respect for persons

#### 11

Respect for the environment

#### 15

Health and safety

#### 19

Ethical commitments regarding content and broadcasts

#### 23

Politics and association

#### 27

Preventing conflicts of interest

#### 31

Gifts and invitations

#### 35

Relations with clients, suppliers and providers

#### 39

The fight against fraud and corruption

#### 43

Professional discretion and confidentiality

#### **!7**

Protecting the company's assets

#### 51

Communicating outside the group and on social networks

## **Editorial**

We all contribute to the success of France Télévisions in our work, actions and decisions, of course, but also our conduct.

Our company expects exemplary conduct - even more so as a public service provider - to gain and retain the trust of our audiences and all our business partners.

The conduct of each of us is an essential component of our image and reputation, as well as the trust we inspire around us: it must therefore be exemplary. To ensure we all know what is expected, we have set out in this charter the ethical principles that must guide our actions and conduct every day. Compliance with these principles is essential to protect the company, as well as every employee.

Please read the charter, remember the principles, and refer to it whenever you find yourself in a sensitive situation. When in doubt, do not hesitate

sensitive situation. When in doubt, do not hesitate to seek advice from your colleagues or management.

#### **Delphine Ernotte Cunci**

Chair and CEO, France Télévisions

December 2017



## What is the

# **Ethics Charter?**

The Ethics Charter sets out the principles for our collective and individual conduct that must guide our decisions and actions as employees of the France Télévisions Group.

Our compliance with these principles is essential to reinforce the trust of all group stakeholders and avoid placing any one of us or France Télévisions at risk. While it is important to achieve our objectives, the way we do so is just as crucial. The Ethics Charter helps us adopt the right attitude and make the right decisions by acting with loyalty and integrity, respecting others and avoiding conflicts of

# Compliance with the laws and regulations

Every group employee must comply with the laws and regulations in their daily work.

As an audio-visual public service group, France Télévisions has specific duties imposed by the laws and regulations, and we must all be aware of those that apply to our specific areas

Some legal fields are increasingly complex and change on a regular basis.

When in doubt, feel free to ask your line manager or the legal department for advice before making a decision to avoid any risk for yourself or the company.

## To whom does this charter apply?

It applies to all France Télévisions employees

### How to use this charter?

The charter provides information to all employees on the conduct they must adopt in sensitive situations they may face in their work.

When in doubt in such a situation, it is important to ask the right questions before making a decision.

This charter should help you.
You can also ask

You can also ask yourself the following questions:

- Does this comply with the Ethics Charter?
- Is it legal?
- How would my actions affect

our stakeholders and how I be able to justify my decision?

- If these were made public, what would the reaction be?
  - Am I prepared to fully assume my decisions vis-à-vis colleagues, employees, my line manager or third parties?
  - Am I able to make an impartial decision in favour of the company and not for a personal interest to the company's detriment?
  - Does my conscience allow me to make this decision?
  - •Does my action or decision protect our company's reputation?

What happens if I do not comply with the charter?

The principles set out in this document are not optional: you must abide by them. Non-compliance is punishable under the laws and regulations.

#### Seek advice

Don't forget that, when in doubt or in a sensitive situation, you can always seek advice. Your line manager is there to help you in this kind of situation. Feel free to speak to him or her. You may also talk to the Human Resources Department, the Legal Department, the Non-Programme Purchasing Department, or another specialized department in the company, or the one responsible for ethics.

depending on the issue in

question.



# for

# respect persons

## What does this mean?

quality business relations both internally among colleagues and externally with all those; we are in contact with in a business context.

As France Télévisions employees, we respect each diversity (the "Diversité" other and ensure the work environment is pleasant, harmonious and nondiscriminatory, respecting diversity and human dignity. prevent and punish any As France Télévisions managers, we promote equal opportunity for every agreements relative to

employee at each stage of their career, from hiring and pay to internal mobility, career development and access to training. Our decisions are based exclusively on skills and professional experience. We all promote label granted in March 2014), prohibit any discrimination based on unlawful grounds (\*), and form of harassment. We have signed

gender equality, disability, and the employment of youth and seniors, and have signed parenthood and LGBT charters.

Three special tools (phone and website) have been implemented and communicated extensively within the company. They are available to employees who need to talk, or want advice or answers to questions on discrimination, psychological support and disabilities.

(\*) Discrimination means any distinction made between individuals based on their origin, gender, family situation, pregnancy, physical appearance, specific vulnerability arising from their economic situation that is apparent or known, their last name, residence, state of health, disability, genetic features, mores, sexual orientation or identity, age, political opinions, union activities, actual or supposed ethnicity, citizenship or religion.

## "Talk to your line manager, HR manager or diversity representative."

# What is expected of me

- Comply with labour laws and take their and regulations.
- Respect others (colleagues, consideration. employees, management, • Do not use violent internal and external contacts) and treat others as I would like to be treated.
- Treat everyone with courtesy, fairness and respect at all times.
- Do not harass or discriminate against others, notably regarding gender, age, origin, religion, sexual orientation, disability, state of health, physical appearance, union membership, etc. Listen to colleagues

- contributions into
- or threatening words, gestures or attitudes.

**Examples** 

- How should I react to derogatory jokes (homophobic, sexist, etc.) circulating among certain colleagues?
- \* Try to make the person who makes such jokes understand that his/her behaviour is unacceptable. Or else speak to your line manager, HR manager or diversity representative.
- France Télévisions' diversity policy is a priority. Does this mean

#### only women, ethnic minorities or the disabled should be hired?

- \* No. The upstream hiring process allows for diversity in applications. The manager is responsible for choosing the best applicant for the job based on objective criteria regarding skills and professionalism.
- One of my colleagues has informed me she/he was the subject of inappropriate behaviour from his/her line manager. What should I do?
- Encourage the individual to speak with his/her line

manager, if he/she feels comfortable doing so. If

not, tell the person to

discrimination issues, or

hotline for psychological

the psychosocial risks

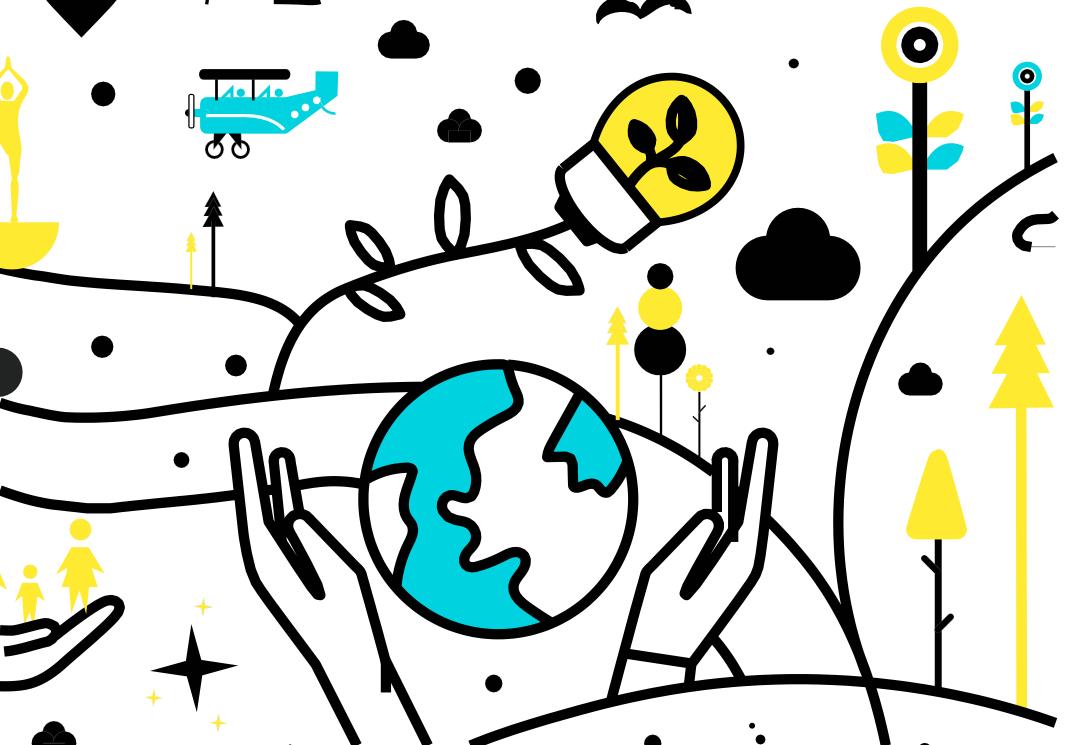
support.

talk to his/her HR



- gender equality, employment for seniors and youth, etc.):
- Disability,
- Gender equality
- Employment for seniors and youth.
- Parenthood Charter.
- LGBT Charter
- Allo Discrim website
- Psychosocial risks hotline (0800 503 204).
- Disability issues (0800) 200 260).





# the environment

# What does this mean?

France Télévisions
Group is committed to
the fight against
climate change and
endeavours to reduce
the negative impact of
its business while
improving its positive
impact, based on three
pillars:

- Reducing the environmental footprint of its operations;
- Implementing a process to reduce the direct impact of its filming;
- Communicating and informing the public about environmental challenges.

In particular, we must actively contribute to the achievement of the group's objectives to reduce the environmental impact of its daily operations. Our responsible purchasing policy (\*) is proactive, and we expect our suppliers and providers to comply with the laws and regulations imposed by the competent authorities regarding corporate social responsibility (CSR) and sustainable development. CSR terms are included in all our

calls to tender,
whenever possible, in
the form of a contract
award criterion or a
contractual enforcement
clause.

As a media, France Télévisions plays a key role in raising awareness on the environment, and pays careful attention to sustainable development issues in its programming.

(\*) Responsible purchasing means taking environmental, societal and economic considerations into account to meet sustainable development challenges.

# What is expected of me

- Ensure energy resources are used properly, and avoid waste by adopting simple daily habits such as turning off lights and computer equipment, making sure taps are closed, only printing documents when necessary, etc.
- Reduce unnecessary travel.
- Avoid waste and implement appropriate selective sorting so waste can be properly treated and recycled.
- Encourage

suppliers and providers to apply environmental protection rules and establish an appraisal criterion in this regard.

- Help improve
- awareness by sharing with all the group's stakeholders (colleagues, audience, providers, suppliers, academia, etc.) the same vision of the environment as a source of progress and opportunities.
- Remember that even small gestures make a difference.

#### **Examples**

· Why adapt my behaviour to help the environment if I am the only one to do so?

\* The issue of an individual's behaviour to protect the environment and fight climate change is fundamental. Appropriate behaviour is essential. For example, a building under construction or renovation for which

energy performance

intend to be optimal will not be able to achieve its objectives if good practices are not applied.

· I turn off the lights, but I leave my computer on or on standby because it takes too much time to reboot.

\* Although computers consume less and less in standby mode, they do use energy over time, and this can be expensive. It is estimated that, for computers alone,

65% of energy consumption is attributable to standby or screen saver mode. Everyone has a role to play because, when many similar actions are taken, the total impact on the environment and climate is significant.

- · Mv messaging system is full: I am going to ask the IT Department for more memory.
- \*The use of new technologies generates hidden pollution that is still ill defined. The more we

communicate, the more we use and need data centres, which consume a good deal of energy and resources. It is not about restricting communication but about adapting to these new challenges. I make my profile and messaging system lighter by deleting files and emails that I no longer feel I need. (By deleting 30 emails, I reduce energy consumption equal to that of a light bulb left on for 24 hours.) When I can, I send links rather than attach files.

### For more information:

- France Télévisions Specifications, Appendix Art. 7.
- CSR principles for responsible purchasing
- Sustainable Development Charter for Public Establishments and Enterprises
- The dedicated sections on the group's intranet:
- Mv company/ environmental responsibility
- Our activities/Non-

programme purchasing

- Our activities/real estate and general resources

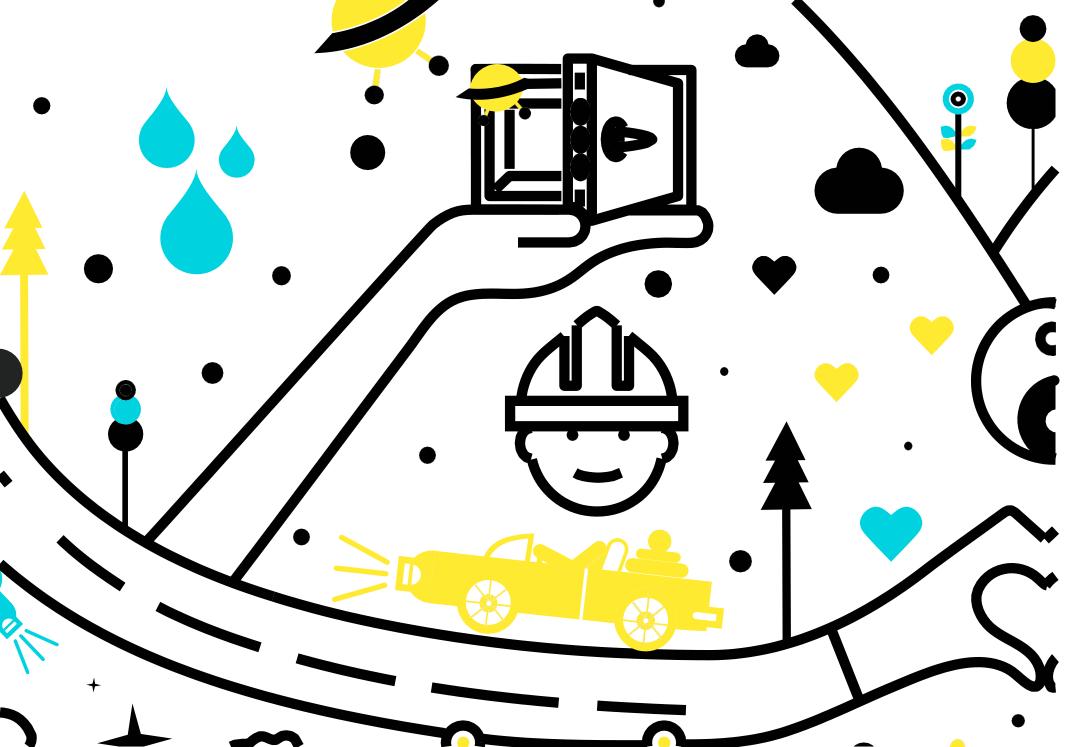
Ethics Charter:

"Remember that even small

gestures make a difference"

"Relations with clients, suppliers and providers".





# nealth and safety

# What does this mean?

France Télévisions
Group is committed to
continuing to take the
measures required to
protect the health and
safety of its
employees, and to
optimize site security
in accordance with
health and safety laws
and regulations.

Fostering a corporate culture promoting the health, safety and quality of life at work is a priority and strategic goal for the group.

We are particularly committed to promoting the health of employees throughout their career, to integrating technological and business advances into our health and safety processes, and to supporting all of the company's stakeholders in implementing a strong, sustainable and operational health policy.

We implement all the safety measures that are necessary on each of our sites, notably those required for establishments open to the public. Everyone one of us must help maintain a healthy and safe working environment.

"Be attentive to others, and if I think someone is in difficulty, report it"

# What is expected of me

- Comply with the health and safety rules in force in the company.
- what to do in an emergency situation on my work site, notably by complying rapidly with all evacuation procedures and instructions.

  Report any situation that may jeopardize the safety of our work environment to my line manager or the person in charge of safety.

Make sure I know

- Refrain from working under the influence of drugs or alcohol.
- Be attentive to others, and if I think someone is in difficulty, report it.



- I ensure that individuals I invite from outside the company sign in and are accompanied throughout their presence on site.
- I notice that a colleague who was entrusted with the keys for the reporters' vehicle upon leaving the office is obviously under the influence of alcohol and no longer able to drive us safely. What should I do?
- 1. I offer to drive and make sure the team returns safely.
- 2. If the colleague



refuses, with my line

for alternative ways of

returning to the office

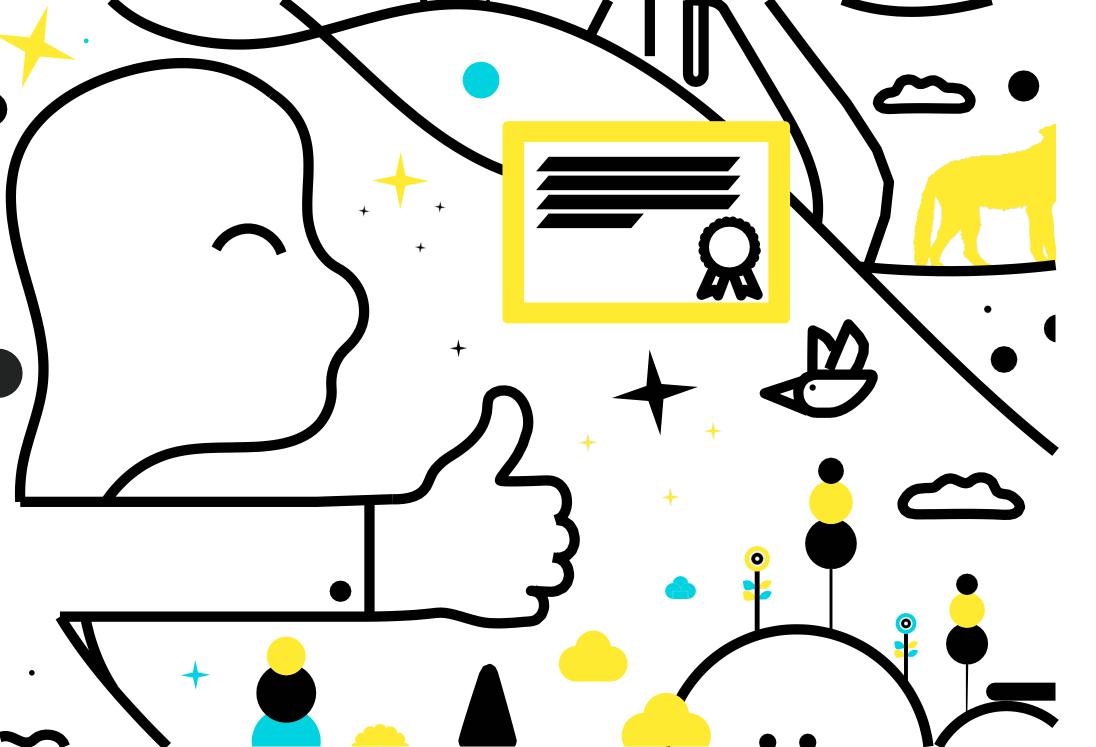
safely (by taxi, public

etc.).

transportation, a rental,

manager's approval, I look

- Internal Rules.
- Action data sheets (conduct to adopt in risk situations).



# regarding content and broadcasts

# What does this mean?

Our main objective is to provide a quality offering that satisfies our audience.

We are committed to exemplarity in the content we produce and broadcast, and to compliance with the laws and regulations governing our business (i.e. mainly, but not only, the French Law of 29 July 1881 on freedom of the press, the French Law of 30 September 1986 on freedom of communication, and France Télévisions' Specifications).

In the France Télévisions Channel Charter, we have set out the principles we must comply with to provide a leading offering, notably with respect to the rights of individuals, honest journalism, pluralism, democratic debate and the fight against discrimination.

In our programmes, we focus on bettering society and pay particular attention to environmental protection issues. We have committed to increasing the number of experts called upon for our content and favour a more extensive diversity in presenters. Guidelines have been issued to help editorial teams and programme managers in this regard.

•••

### (French audiovisual council)

## "Seek advice from internal experts if I have a question or doubt."

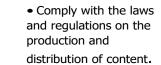
•••

We continuously improve access to our programmes via audio description, sign language and subtitles. Dialogue with all our audiences is important to us, and we favour communication via news to apply ecoand programme production procedures mediators, the television for their content viewer relations [France Télévisions is a department and founding partner of publications on social Écoprod (\*)]. networks. To fulfil our societal commitment, we take measures to transmit tools to understand media and the digital world to our

teachers.

younger viewers and (\*) Ecoprod is a group consisting of Audiens, the CNC, the Commission du film Finally, we endeavour d'Île-de-France. France to reduce the Télévisions, the Pôle Média Grand environmental Paris and TF1. Since 2009, it has footprint of our been developing tools to reduce production by the environmental footprint of encouraging all trades filming.

## What is expected of me?



 Comply with France Télévisions' Chanel Charter, and as a journalist, the professional principles set out in the preamble to Book 3 of France Télévisions' Collective Agreement.

- Comply with the regulations on political pluralism during and after election periods.
- Contribute to compliance with ethical commitments regarding content, and be particularly vigilant

in terms of the honesty of journalism and rigorous management of information, the diversity of perspectives, respect for human rights, notably human dignity, and the fight against discrimination.

- Learn the tools and good practices developed by Écoprod and favour the implementation thereof in the co-productions and productions I work on.
- Seek advice from internal experts if I have a question or doubt.



### For more information:

 FranceTélévisions Channel Charter.

 Collective Agreement, Book 3, Section 1: "Professional principles for iournalists".

- French Law of 29 July 1981 on freedom of the
- French Law of 30 September 1986 on freedom of communication.
- FranceTélévisions' Specifications.
- Recommendations/ decisions of the CSA

- French Decree of 27 March 1992 on publicity and sponsorships.
- Websites for experts: expertes.fr and expertiseplus.eu
- The Écoprod association website: ecoprod.com





# politics and associations

# What does this mean?

France Télévisions
Group does not
contribute to political
activities or parties
(\*).

As a public service audiovisual group, France
Télévisions must remain absolutely neutral and, with its channels, ensure pluralism in news, as well as in the expression of schools of thought and opinions.

The group respects the rights of its employees, as citizens, to privately participate in political activities or associations. This involvement must take place outside the sphere of the employment contract (and therefore with no reference to working at France Télévisions) and avoid any conflict of interest vis-à-vis the group. It must be made clear that the opinions expressed in this context are exclusively personal and in no way bind the group.

Specific attention must be paid in this regard when employees are candidates (or publicly support a candidate) for election. They may not be on television during the official campaign, and specific obligations (the subject of an internal memorandum, in addition to the Channel Charter, that is communicated for each voting round) may also exist for the preceding period, so that no favouritism is created vis-à-vis other candidates (an "image effect").

Communications on social networks must be made with vigilance and thought when they relate to political matters, and must comply with the principles set out in the Good Practices Guidelines for Social Networks.

(\*) However, Article 46 of France Télévisions' Specifications (regarding the expression of political opinions) provides that, "The financial cost of regular programmes dedicated to the direct expression of political opinions by a political group of either parliamentary chamber is paid by France Télévisions (up to a maximum amount defined by its board of directors)."

## What is expected of me

- $\rightarrow$  At all times:
- Avoid expressing a political opinion in a business setting;
- be private opinions;
- Be careful with political content published on social networks (comply with the principles set out in the Good Practices Guidelines for Social Networks).
- → If, as a citizen, I am involved in political activities or associations:
- expressed are understood to personal, i.e. outside of my place of work and working hours, and without using the group's resources (telephone, computer, paper, photocopiers, etc.);
  - Never refer to the fact that I belong to the group;
  - Inform management if I have any doubt about a potential or actual conflict of interest with my responsibilities within the group.

- $\rightarrow$  If I am a candidate for an election:
- Inform management if I may be on air occasionally • Ensure that opinions • Ensure the involvement is or regularly (or contribute to a show) as part of my work within the group;
  - Comply with the regulations and internal procedures regarding television appearances.



### For more information:

- France Télévisions Specifications, Appendix Art. 35, on honesty and pluralism in news.
- French Law of 30 September 1986, Art. 1 and 13 on the pluralist expression of schools of thought and opinions.
- CSA decision regarding candidates for an election.

 Channel Charter, notably Art. 6.1.6 on candidacies for an election.

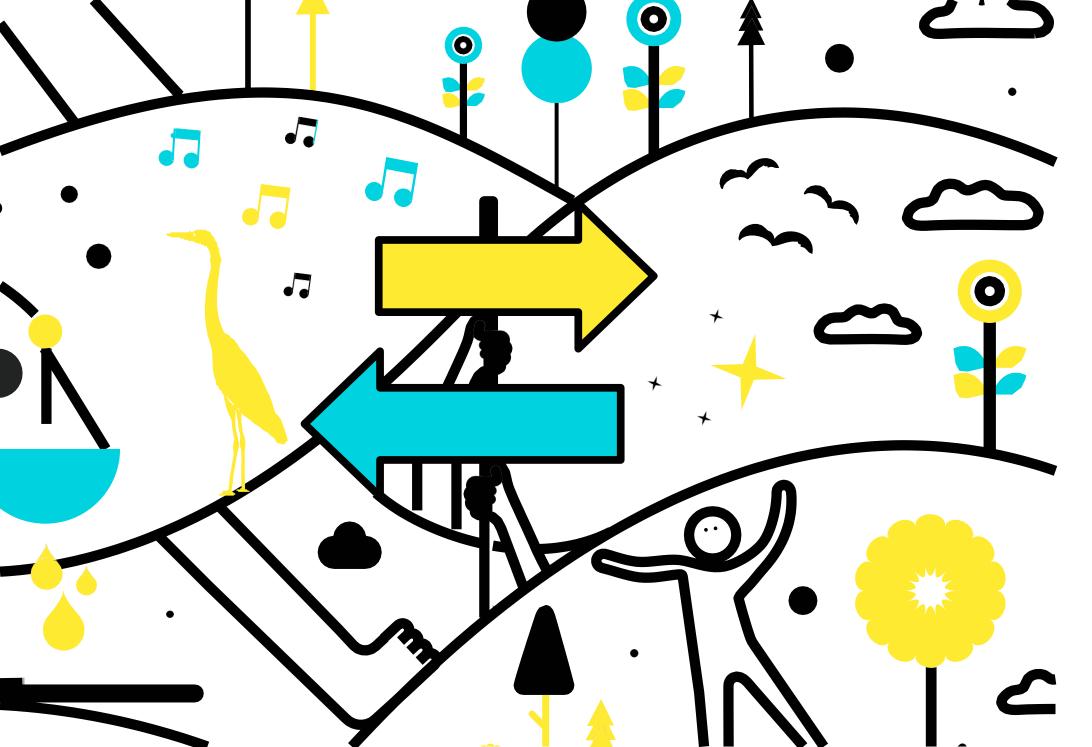
"Avoid expressing a

in a business setting."

political opinion

- France Télévisions' Collective Agreement of 28 May 2013 for journalists, Book 3, Section 1, Art. 1.1.
- Good Practices Guidelines for Social Networks.





# conflicts of interest

# What does this mean?

A conflict of interest is a situation in which the personal interests of an employee (or someone close to the employee) are or may be in conflict with those of the group.

For example, when an employee:

• Directly, or through an intermediary, has a stake in a rival company or one that has a business relationship (or may due to the nature of its business) with one of the group's entities that may compromise his or her independence;

- Accepts a gift/invitation/advantage that is not just symbolic and may cause the employee to feel he or she is indebted;
- Has close personal relations with another group employee (or job applicant) and participates in an evaluation, selection or check concerning said employee or applicant;
- Exercises a business activity or assignment outside the company that may influence the employee's decision or judgment in the execution of his or her professional duties for the group;
- Participates in a purchasing process involving a company with which the employee has a tie directly or through a family member or close friend.

One must avoid these types of situations.
We must all analyse our personal situation and inform management openly before making a decision if a conflict of interest exists or seems to exist that could affect the objectivity of our decisions.

Each employee and job applicant fills out a form to declare any risk of a conflict of interest.

# What is expected of me?

- Inform my line management of any relationship that may create a conflict of interest or be perceived as such, so that an indepth analysis can be conducted and appropriate measures taken, if needed, prior to making a decision.
- Anticipate any risk of a conflict of interest I may face every time I change positions or launch a new purchasing project.
   When applicable, declare

- a potential conflict of interest and refrain from participating in the decision-making process or, when in doubt, share information with my line management.
- Comply with the Ethics Charter rules regarding gifts and invitations.
- Comply with the company's procedures on external collaborations: file a written request with my line management for any external collaboration and obtain written authorization before starting. Renew the request for any new proposal regarding a

collaboration, even when it is of the same type.

 Refrain from any involvement in the hiring or career development of an employee with whom I have a close relationship (compensation, performance evaluation, promotion, etc.), as well as any check regarding said employee.

### **Examples**

- · A member of my family or a close friend works in the same department as me.
  What is expected of me?
  \*You must file a declaration so that evaluations of this person are conducted by a third party.
- · Someone close to me heads a company that may be called upon as a supplier or provider. Are contracts with such a company prohibited?

- \* No, but you must declare the existence of this relationship to your line management and in no case interfere in the purchasing process.
- I am working on a programme that is in its selection or development stage. A member of my family is involved in this project. What should I
- \* I inform my line manager and do not approve the project unless management expressly agrees.
- As a journalist, I have been asked to provide advice to corporate executives or association managers who want to learn how to behave in front of a camera. Do I have authorization to do this?

  \* No, this is a "media"
- camera. Do I have
  authorization to do this
  \* No, this is a "media
  training" activity, which
  France Télévisions
  journalists are not
  authorized to conduct.



- Ethics Charter: "Gifts and invitations".
- External collaborations:
- Channel Charter, Art.
- 6.1.2,
- Collective
   Agreement, Book 1,
   Art 3.5 et 3.6:
   "Collaboration
   exclusivity" and
   "Conflicts of Interest".
- External collaboration memorandum.
- Collective Agreement, Book 3, Section 1: "Professional principles for journalists".





# What does this mean?

Gifts (\*) and invitations can be a sign of courtesy in business relations, but their acceptance or offering must comply with certain rules so they are not perceived as receiving or granting an inappropriate advantage, influencing a decision or leading to a suspected conflict of interest.

It must be deemed reasonable, and the employee must be transparent vis-à-vis his or her line management. The business context must also be examined.

As an exception to this rule, group employees whose position means they participate in public procurement processes may not accept any gift (other than promotional items of little value, or gifts of little value that are a cultural tradition in certain countries such as Japan). These rules are indicated

in the non-programme purchasing procedure. Similarly, in certain circumstances - and this applies to all employees no gift or invitation may be accepted, regardless of its value, notably during a call for tenders and when decisions are being taken that may regard the author of the invitation.

(\*) A gift means any item, service, advantage, etc.

## What is expected of me

I may accept a gift (if I do not participate in public procurement processes), as long as:

- It is worth less than €150 (estimated public value), including as a total (if a number of gifts are offered by the same third party over a 12-month period and the total value exceeds the maximum value authorized, I politely decline the second and ensuing gifts, where applicable);
- I inform my line manager, who approves;

• I share the gift with the team whenever possible.

I must not:

- Accept a gift worth more than €150 (unit or total price);
- Accept a financial gift
- Accept a gift at my home;
- Accept a gift in the form of a service or other benefit-in-kind (e.g. to have a friend or family member hired, etc.);
- Accept a gift or advantage for a member of my family or a close friend
- Ask for a gift or advantage for myself, a member of my family or a close friend.

I can accept a lunch invitation if:

- purposes; The price is reasonable;
  - It does not take place during a call for tenders or when a decision is being taken regarding the author of the invitation.

• It is for business

- short stays, etc.: They must be for business purposes;
- I must ask my manager for authorization and provide information on the invitation (purpose, date, place, programme, participants, if costs are paid);

time in the same year by

the same person, I inform

my line manager and ask

Pay careful attention to

invitations to external

events, seminars, trips,

for authorization.

 If I am a journalist, I comply with the professional principles set out in the Collective Agreement, which

establishes a certain number If I am invited for a second of rules regarding invitations during shootings.

> I politely but firmly refuse any gift or invitation that does not comply with the principles referred to above. When in doubt, I ask my line manager for advice.

I apply the same rules for gifts and invitations that I could give on behalf of the group, it being noted that I can only do so with my line manager's approval. I inform my business partners of the group's policy in this regard, and share France Télévisions' Ethics Charter with them.

### **Examples**

I am invited by a producer (or a technical or IT provider) to a business event abroad. Can I accept this invitation?

"I must not accept a gift at my home."

\*No. As the value of this invitation is obviously high, you may not accept it as it may influence your judgment regarding future decisions or appear to. If management feels your presence at this event is necessary, France Télévisions will pay your costs.

· At a work seminar organized by an external provider, an activity unrelated to business is proposed. Can I accept?

\* Yes, if the time this activity takes is marginal compared to the main purpose of the invitation and if the cost

· France Télévisions' Communications Department sent me two invitations for a show

is low.

(or sporting event), of which France Télévisions is a partner. It is unrelated to my business activity at France Télévisions. Can I still accept

them?

Communications

suspected.

of interest could be

Department, no conflict

Programme Goods and Services, point V: \* Yes, of course. As the supplier relations. invitation was provided by France Télévisions'

• Collective Agreement for journalists: Book 3, Art. 1.5: "External financing".

For more

information

Procedure for

Purchasing Non-

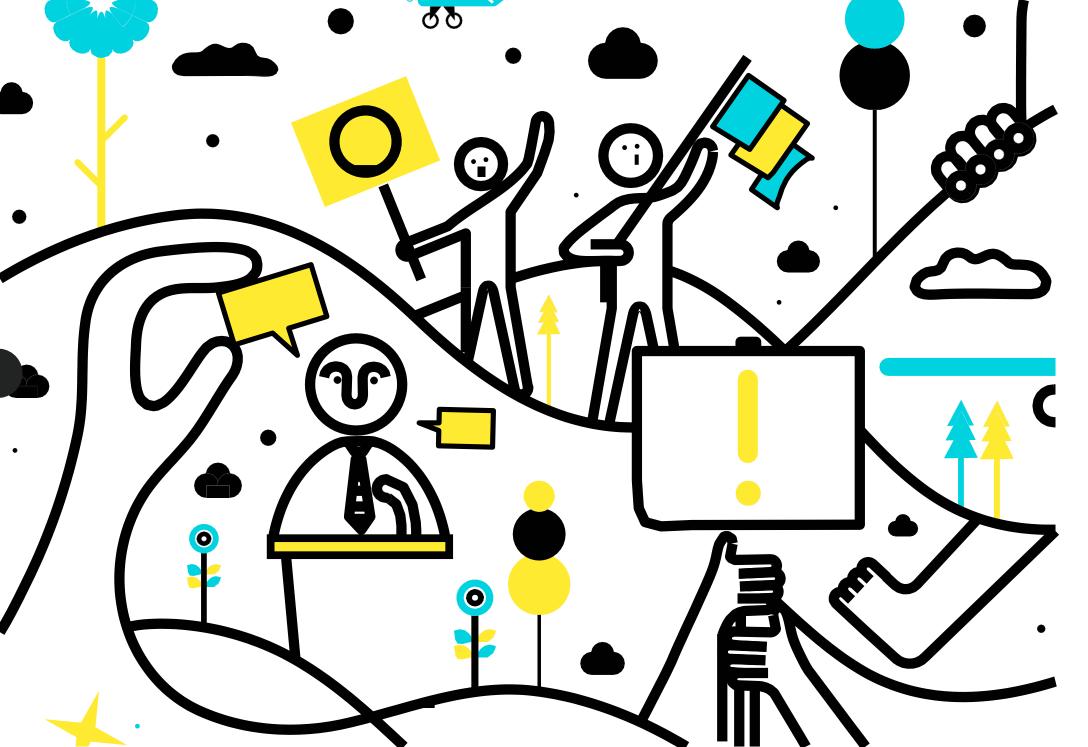
France Télévisions' Collective Agreement of 28 May 2013, Appendix to Book 3:

Ethics Charter for Journalists

> • Channel Charter, Art. 6.1.5 "Gifts".







# relations with clients, suppliers and providers

# What does this mean?

The group seeks to create honest, fair and equitable relations of trust with its business partners.

We comply with the laws and regulations, notably competition law, and apply the procedures defined by France Télévisions for non-programme public procurement.

We attach great importance to the prevention of conflicts of interest and the fight against corruption.

As managers, we ensure that the conduct of our employees involved in business processes is loyal to the company, and is fair, equitable and impartial during negotiations, and also that they treat their contacts with respect, courtesy and professionalism.

We implement specific procedures for the different business activities (sales, purchases, non-programme purchases, etc.) by entity and ensure they are complied with.

Our responsible purchasing policy is proactive (\*) and we include CSR criteria in our calls for tenders. We expect the suppliers and providers with whom we work to comply with the laws and regulations imposed by the competent authorities regarding corporate social responsibility and sustainable development.

(\*) Responsible purchasing includes the company's sustainable development goals, taking into account environmental, societal and economic factors. "Information not intended to be disclosed must be treated as confidential."

...

We all share our ethical principles with our suppliers advisors or and providers by providing them notably with this charter, Selection must be and we encourage them to adopt similar practices. In particular, we ask our suppliers and providers to declare any conflict that may affect their assignment or service.

Use of intermediaries. consultants meticulous and comply with public procurement rules. Only authorized individuals who have signing authority may sign such contracts on behalf of France Télévisions.

> The services must actually be provided (such as deliverables, etc.); compensation must be transparent and in line with the services stipulated in the contract.

## What is expected of me?

In business relations:

- Comply with the procedure(s) implemented by my company regarding business affairs in which I participate as part of my job;
- Act with transparency;
- Be fair and equitable at each stage of the process;
- Ensure information not intended to be disclosed is treated as confidential:
- Before negotiations, or the selection of suppliers/ providers, or a significant interaction, inform my line management

of any relationship with current or potential partners with whom I have nonbusiness, family or friendly ties, or a financial interest; if such a tie exists, refrain from any involvement in the business relations with this entity on behalf of the group.

I must also examine my personal situation when a new purchasing project is launched, in particular. When in doubt, I seek advice from my line manager:

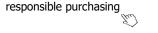
Scrupulously

comply with the group's rules on gifts and invitations so as to avoid any risk of a conflict of interest or corruption. Remember that, in certain cases (notably during calls for tenders or decision-making periods, or for employees involved in public procurement), no gift or invitation may be accepted or offered;

 Provide this Ethics Charter to my partners and encourage them to adopt similar principles.



- Ethics Charter: "Preventing conflicts of interest".
- Ethics Charter: "Gifts and invitations".
- Programme commitment procedure
- Procedure for
- Purchasing Non-Programme Goods and Services.
- CSR principles for





# ine fight against raud and corruption

# What does this mean?

Zero tolerance is the rule for any type of corruption, whether active or passive.

Active corruption: any undue advantage offered or promised in order to have a third party (directly or through an intermediary) perform, delay, speed up, improve or refrain from performing an act that falls within said party's duties or is facilitated thanks to his or her position.

Passive corruption: any undue advantage asked

of or accepted from a third party in return for performing, delaying or refraining from performing an act that falls within the party's duties or is facilitated thanks to his or her position.

Any act that directly or indirectly leads to corruption is strictly prohibited and may lead to the imposition of civil or criminal penalties on the company and employee, in addition to disciplinary penalties.

The payment or acceptance of unlawful sums is prohibited.

All forms of fraud are prohibited, whether they concern the assets of France Télévisions or those of third parties.

"Zero tolerance is the rule for any type of corruption."

## What is expected of me?

- Comply with internal procedures and refrain from using France Télévisions' assets for personal or unlawful use or corruption.
- Comply with legal and contractual rules regarding the fight against corruption and ask our providers to do the same.
- Comply with the terms of France Télévisions' Anti-Corruption Code of Conduct.
- Comply with France Télévisions' rules regarding gifts and invitations (see the "Gifts and invitations" section of the Ethics Charter) and, in particular,

do not offer or promise a gift or advantage to a third France Télévisions' party to obtain an undue advantage, nor accept or ask for a gift or advantage that may cause me to breach my obligation of loyalty to France Télévisions or be perceived as influencing a business relationship.

- When in doubt, ask my line manager or the legal department for advice before making any
- Immediately inform my line manager if I become aware of inappropriate conduct. If I want, I may

send this information using whistleblowing system.

 Cooperate diligently and transparently with the internal control and audit processes.



- France Télévisions' Anti-Corruption Code of Conduct.
- French Law No. 2016-1691 of 9 December 2016 on transparency, the fight against corruption, and the modernization of the economy (otherwise known as the Sapin II Law).
- Whistleblowing Procedure.





0

# What does this mean?

Professional discretion is the rule for any event, information or project related to the company or group that we may become aware of in our work or, more fortuitously, because of our ties to the company.

We protect confidential information. This information is only used in a business environment and must not be disclosed outside the company without specific authorization (even after leaving the company) nor shared internally

individuals
whose work
does not
require them
to be aware of
this
information,
as the
disclosure
thereof may
prejudice the
group's
interests and
image.

Purchases, in

particular, require strict confidentiality at many stages of the process.

Special attention must be paid to the protection of personal data. Disclosure of personal data constitutes an invasion of privacy.

Personal data are information that directly or indirectly identifies an individual (a name, ID number, telephone number, photograph, date of birth, residential address, etc.).

6

"Comply with the security rules in the IT Charter."

# What is expected of me?

- Keep all confidential information in my possession safe, whether in paper or electronic format (e.g. ensure these documents are kept under lock and key, refrain from communicating my password, be vigilant when talking on the phone handsfree, etc.).
- Professional discretion is the rule for sensitive or confidential information, including when I'm with my family and friends.
   Comply with the

security rules in the IT

Charter.

Ensure the providers
 I may entrust with the
 collection or
 processing of personal
 data abide by these
 principles.

areas.

Comply with the rules

governing the protection

Be careful when I have

conversations or work in

(including the company's

public areas: trains,

airplanes, restaurants

cafeteria), as well as

coffee break and rest

of personal data.

### **Examples**

I use a password to open files that have sensitive information (in Word, Excel, etc.).
When I use public transportation, if others can see my computer screen, I do not open a

transportation, if others can see my computer screen, I do not open an email or document that includes confidential information.



- Collective Agreement, Book 1, Art. 3.4: "Professional discretion"
- FranceTélévisions' IT Charter.
- Procedure for Purchasing Non-Programme Goods and Services.





## What does this mean?

The safety and protection of assets are essential to protect the group's interests.

"Assets" means the material and immaterial property of the group (such as intellectual property rights, expertise, technical studies, technical or commercial practices, sensitive information, etc.).

We must help protect and preserve the resources entrusted to us for our work and use them in accordance with internal rules and procedures. In particular, we must be particularly vigilant when we use our IT. Strict compliance with the IT Charter is key to protecting the group from cybersecurity threats.

Special care must be brought to protecting the confidential information in our possession as a result of our work.

PIOLOCLING

# "Refrain from using company resources for personal purposes."

## What is expected of me?

- Keep in mind the fact Refrain from using that all of the company's company resources belong France purposes.
- Preserve and protect the from using resources that company's resources to avoid waste, damage, loss (videos, photos, etc.) or misuse thereof or a sale without ensuring that thereof without authorization.
- Do not bind the company beyond the scope of the authority conferred on me because of my position at FranceTélévisions.

- for personal
- In my work, refrain belong to third parties France Télévisions has the rights required.
- Strictly comply with the IT Charter and refrain from any inappropriate use of the information and messaging systems, and the internet. Reasonable use of communication tools (emails, telephones,

internet and laptop) for private or personal purposes only is allowed as long as it complies with the laws in force, does not prejudice the company's image or disrupt the employee's work or that of its colleagues, does not jeopardize business applications, and is strictly personal.

- Ensure that the confidential information in my possession is retained in such a manner that it cannot be disclosed, stolen or used inappropriately (see the "Confidentiality" section).
- Keep in mind the fact that the confidentiality obligation survives even after I leave the company.

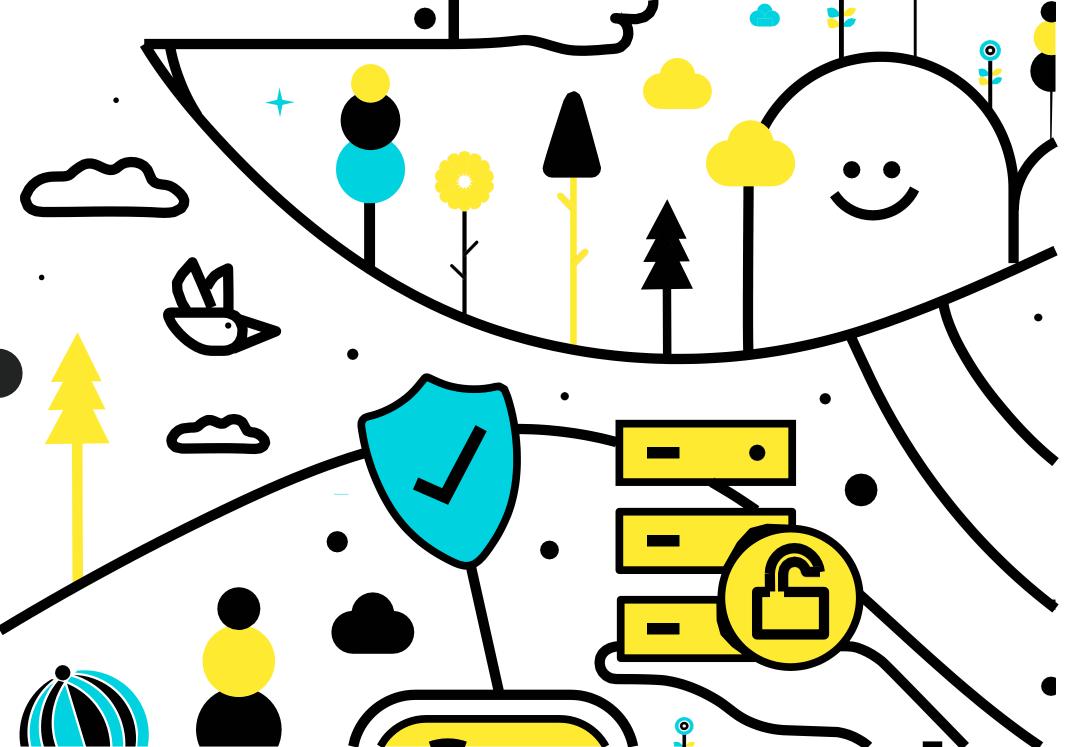


#### **Examples**

• I do not use the centralized storage space to save my personal documents.

- France Télévisions' IT Charter.
- Ethics Charter: "Confidentiality".





# communicating outside the group and on social networks

# What does this mean?

We must be careful with messages sent outside the company to ensure they do not prejudice the group's interests or reputation.

Only those employees who have been duly authorized may speak on behalf of the group.

We refrain in all circumstances from making defamatory statements.

We are careful when we communicate on social networks and never publish sensitive or confidential information, and we respect the privacy of our colleagues and image rights.

As citizens, we may take part in a public debate. We must ensure it is clear that we are expressing personal opinions and do not represent France Télévisions.

# What is expected of me?



- Unless my position allows, I do not communicate outside the group on the company's business or on its behalf unless I have express authorization.
- Inform my line manager and a Communications Department representative of any outside request for a statement or comment on the group, its business or operations, and only reply if I receive authorization to do so.
- Ensure there is no confusion between my personal communications and those of the group.
- Comply with the principles set out in the Good Practices Guidelines for Social Networks.
- In all circumstances, notably when communicating on social networks comply with the duty of loyalty to the group and refrain from any statement denigrating the company.

- Good Practices
   Guidelines for Social
   Networks.
- Collective Agreement, Book 3, Section 1, Art.
   1.1.



