



Employee Code of Conduct





Dear colleagues

Every day, we bring a world of possibilities to millions of people around the world through our exciting and engaging content. As a business, we want to make a positive impact in each and every community in which we operate, whilst continuing to create long term sustainable value for our stakeholders.

As we embrace new challenges and increase our presence in rapidly changing markets, one thing that must never change is our commitment to our values and the highest ethical standards. Our values are the foundation of the unique culture we've built. They differentiate us from our competitors and create trust for our consumers and employees.

To help reinforce the importance of MTG's culture and values, we've re-designed our Code of Conduct to bring the way we do business into even sharper focus. We strive to innovate, inspire and ignite – and in order to make a positive difference each and every day, all of us must own and work in line with the principles written in this Code.

Please take the time to understand our Code of Conduct, and to speak up when you have any concerns. With your help, I am confident that our values and reputation will be upheld long into the future.

Best Regards

Jørgen Madsen Lindemann
President & CEO



Purpose Statement

MTG is committed to conducting its business in full compliance with all applicable laws and regulations, and to achieving exceptional standards of corporate and social responsibility. The purpose of this Code of Conduct (“Code”) is to provide a common framework which enables our people and our businesses to reach their full potential; it exists to ensure that we are individually and collectively accountable for conducting our business with integrity and in accordance with all applicable laws and the MTG values:

Smart

- Obsessed with content
- Empowering talent

Fun

- Fighting boredom
- Doing what we love

Bold

- Thinking big & moving fast
- Always innovating

Engaging

- Putting consumer experience first
- Standing together

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Responsibility and Implementation

This Code applies to all of MTG’s officers, employees (full & part time) and temporary workers (such as consultants, freelancers or contractors) (together referred to as “employees” in this Code) across the group, no matter where they are located or what they do.

This Code should be read and understood alongside MTG policies and guidelines, as well as local handbooks and individual contracts. Serious breaches of this Code may in some instances result in disciplinary action being taken against the employee, or employees concerned.

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Integrity and Responsibility

MTG is aware of its responsibilities to its television, radio and online audiences, and is committed to protecting its editorial independence and to putting consumer experience first by producing, acquiring and delivering programmes of quality and integrity.

When acting on behalf of MTG, employees must behave in a manner which is consistent with

MTG’s values and work to ensure the accuracy, objectivity and independence of our media content.

> See the *Broadcasting Guidelines*.

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Employees

MTG treats employees with dignity and respect. MTG values diversity and believes that employees from varied backgrounds enrich MTG’s culture and support its commercial success.

MTG is committed to providing equal opportunities to all employees irrespective of race, ethnicity, religion, nationality, gender, mental or physical disability, marital status, age, sexual orientation, or any other status unrelated to the individual’s ability to perform his/her job.

We will not tolerate any form of discrimination or sexual, physical or mental harassment (including bullying) at work. All employees are responsible for implementing these practices of fairness, tolerance and mutual respect.

> See the *Human Resources Policy and Equality Guidelines*.

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Conflict of Interest

Employees must not be involved with an activity for personal gain that is in conflict with MTG’s business interests; this could include directorships, significant shareholdings, employment of family members and inter-company relations. Employees should also not work in any capacity for another individual or entity in a way which could materially affect their ability to carry out their job function at MTG. An employee must disclose to their manager any personal interests which he/she or a close relative have which relate to, might affect, or might conflict with, MTG’s business.

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Health and Safety

MTG recognises the importance of health and safety within its business and seeks to provide a clean and secure working environment in line with local laws, regulations and business practice. Employees are required to follow all health and safety policies, procedures, and guidelines that apply to their workplace and exercise maximum care and good judgement.

> See *Health and Safety Policy and Security Guidelines*.

“MTG conducts all aspects of its business with honesty, integrity and openness, respecting human rights and the interests of MTG employees, customers and third parties, and it seeks to work only with suppliers that do the same.”

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Environmental

MTG monitors, measures and reports the environmental impact of its operations and complies with all relevant environmental legislation. MTG encourages all employees to consider the effects of their actions on natural resources and promote public environmental awareness.

> See *the Environmental Guidelines*.

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Fair Competition

MTG competes vigorously but always with honesty and integrity and expects the same

standards of all of its employees.

MTG is committed to free and open competition, and complies with all competition and anti-trust laws. Employees must abide by these laws and principles in all business dealings.

> See *the Competition Guidelines*.

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Ethical Supply Chain

MTG conducts all aspects of its business with honesty, integrity and openness, respecting human rights and the interests of MTG employees, customers and third parties, and it seeks to work only with



suppliers that do the same. Employees must ensure that current and prospective partners and suppliers are aware of, and act in accordance with, MTG's Supplier Code of Conduct.

> See MTG's Supplier Code of Conduct.

employees to communicate in a positive, responsible, transparent and ethical way that champions MTG's values and does not bring the company into disrepute.

> See the Social Media Guidelines & External Communication Guidelines.

MTG on a confidential basis. Such confidentiality obligations continue even after termination of employment with MTG.

> See the Consumer Protection Guidelines and Confidentiality & Privilege Guidelines.

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Communication

MTG's public communications, including reports to shareholders, stock markets or regulators, shall include full, fair and accurate disclosure. Only authorised employees should make comments to media or talk to politicians and other officials about issues that concern MTG at central or local level, and all such comments must be cleared by MTG's Head of Communications. Furthermore MTG requires its

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Confidentiality

MTG strives to uphold the confidentiality of information concerning its employees, customers, clients and suppliers.

Employees must not, except in the proper course of their duties, give anyone any information concerning the business dealings or affairs of MTG, its officers or employees, or disclose information from customers, clients and suppliers which have been provided to

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Data Protection

MTG is committed to respecting an individual's fundamental right to privacy, this applies equally to its employees and customers. As such MTG seeks to comply with all Data Protection laws and regulations within the jurisdictions in which it operates.

MTG holds and processes information about employees, customers, and other data subjects for both administrative and commercial purposes. When handling such information, MTG, and all staff or others who process or use any personal information, must comply with local Data Protection Principles, always ensuring that such information is kept safe and secure.

> See the Data Protection Guidelines.

“MTG is committed to respecting an individual's fundamental right to privacy, this applies equally to its employees and customers.”



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Anti-Bribery and Corruption

MTG does not tolerate any form of bribery, corruption or inducement to act improperly, whether direct or indirect, in the public or private sector, by or of its employees, suppliers, customers, partners, agents, or consultants or any persons or companies acting for or on MTG's behalf.

MTG believes that business decisions should be made for purely business reasons in the interests of MTG and not based on any inducement or reward offered or provided for the purpose of improperly obtaining or retaining a business advantage.

Employees are required to know and abide by MTG's Anti-Bribery and Corruption Policy and its Gifts and Hospitality Guidance.

> See *Anti-Bribery and Corruption Policy and supporting Gifts and Hospitality Guidance*.

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Insider Trading

MTG and its employees comply with applicable insider trading legislation and best practice. All employees are subject to relevant legislation,

and additional obligations apply to those MTG employees who are deemed, under MTG's Insider Rules, to be 'MTG Insiders'.

> See *the Insider Rules*.

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Whistleblower Policy

MTG expects its employees to report any serious breaches of this Code or any applicable laws.

MTG encourages employees to raise these at the earliest possible stage and where possible through the usual reporting lines e.g. HR related complaints should be raised with your local HR representative and other work related complaints with your line manager. However, MTG recognises that there may be some circumstances where you feel uncomfortable or unable to use the usual reporting lines, in such circumstances you may report using our Whistleblowing procedures which include our independent Confidential Reporting System called SpeakUp which enables employees to make such reports anonymously if they so wish.

> See *the Whistleblower Policy*.

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Disciplinary Procedure

Serious breaches of this Code, the employee's contract or any local MTG rules may result in disciplinary action. The disciplinary procedure is subject to local laws and regulations, as well as local business standards. For more information, employees should contact their local HR department.

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Further Information

If you have any questions in relation to this Code, please contact:

moderncompliance@mtg.com

