Who are we?

This is a vital question for every organization in today’s fast moving world. And MTG’s answer is clear – we are a global digital entertainer and we believe that responsible entertainment is better entertainment. We constantly innovate and challenge, and we always seek to act in a fair and honest way towards each other and all of our stakeholders. We embrace diversity and promote equality.

We are not only investing in our well-established broadcasting operations, but also in streaming, esports, digital video networks and online gaming. We are doing different things – but that does not mean that we are doing things differently. Even when so much in our industry is changing so fast, our commitment to doing the right thing in the right way remains the same.

This Code of Conduct sets out what we expect from each other. Please take the time to read it, understand it, follow it, and speak up when you have any concerns. This is who we are and what we stand for.

Our Code of Conduct applies to all MTG employees, including employees of entities in which MTG exercises decisive control, and Board members. It also applies to temporary workers including contractors, freelancers and consultants. Additional policies and guidelines may apply to specific roles and responsibilities and are advised by our managers.

If you have any questions concerning this Code of Conduct – or if you are ever uncertain how to act – please contact your line manager, local HR team, local CEO, MTG’s Group Compliance Officer or MTG’s Corporate Responsibility department.

Thank you.

Jørgen Madsen Lindemann
President & CEO
What we stand for

**Smart**
we are obsessed with content and empower talent

**Fun**
we fight boredom and do what we love

**Engaging**
we put consumer experience first and stand together

**Bold**
we think big, move fast, and we are always innovating

Success is based on strong culture, clear strategy and excellent performance. Our ambition is to be the leading provider of digital entertainment experiences in each of our markets. We are shaping the future of entertainment by connecting consumers with the content that they love through multiple screens in the home and on the move, online and offline, scheduled and on demand. We want to reach, engage and entertain more and more people every day; to make as much positive impact as possible in the communities in which we operate; and to create long term sustainable value for all of our stakeholders. We are managing the transformation of a traditional national broadcaster into a global digital entertainer.

We want to be the employer, provider and partner of choice in the entertainment industry wherever and whenever we act. This Code of Conduct clearly expresses our values, as well as our personality as ‘the Igniter’ – striving to inspire and ignite, exploring opportunities, enhancing lives, shaping the future. Which is why this Code of Conduct is entitled ‘Igniting Right!’ It is a practical guide to how we do (and don’t do) business and help us to navigate the ethical and legal situations we face on a daily basis.

We are committed to conducting our business in full compliance with all applicable laws and regulations – and to achieving exceptional standards of corporate and social responsibility. Responsibility is at the core of MTG’s business, and is closely integrated with our strategy, values and culture. As a responsible global business, we are committed to international initiatives and standards such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the Fundamental Conventions of the International Labor Organization, the UN Universal Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights.

Each of us is responsible for being familiar with this Code and for seeking guidance when we need advice regarding the principles outlined in this Code, when we want to raise concerns, or when we are unsure whether our conduct would be acceptable.

For further information and contact details, see Raising concerns (p.7) and Ethics checklist and contact information (p.8) at the end of this Code.
Committed to our people & our world

Everyone at MTG expects and gets equal opportunities

We understand, respect and value each other’s differences

We are committed to each other and to the environment that we share

**Diversity, equality and non-discrimination.** We should all enjoy equal opportunities. When it comes to recruitment, promotion and training, what counts is competence, experience and performance. We believe that successful teams are diverse teams. We understand, respect and value each other’s differences. We do not tolerate discrimination, bullying, victimization or any kind of harassment.

**Fair working conditions.** We provide a professional environment that is in line with universal human and labour rights standards, applicable laws, and agreements on working hours and compensation. We are free to join associations or unions, and to bargain collectively or individually. Child labour, or forced labour at any age, is not tolerated in our business or supply chain. We have completed compulsory education before joining MTG.

**Health & safety.** MTG provides a safe working environment that promotes physical and psychosocial wellbeing. Our offices and facilities comply with all applicable health and safety regulations. When travelling for business, we have access to an incident reporting system (including a mobile app) that gives us and the MTG security team visibility and notification about any security incidents. Everyone should enjoy their job and have a healthy work-life balance, so we discourage work outside of office hours.

**Protecting our environment.** Our planet is our home. We nurture and safeguard the environment by keeping track of our carbon footprint, mapping our energy consumption, and encouraging each other to recycle waste and reuse equipment where possible. We also offer virtual meeting options such as Skype for Business as alternatives to business travel.

**Who to contact with questions or concerns:** your line manager, local CEO or HR team, or MTG’s Corporate Responsibility department.
When we watch or listen to our content, we are enjoying some of MTG’s most obvious assets. But there is even more behind the scenes – our software, computer systems, equipment (including desktops, laptops, tablets and phones), intellectual property, strategy plans and data are assets too. So is the MTG name – and even our logos. Every asset enables the success and sustainability of our business in some way. We are all responsible for protecting and using them correctly. We are careful about how we use our IT assets, about how we handle confidential information, and about our responsibilities even after we leave MTG.

**Protecting our assets safeguards our business – this is a responsibility we all own.**

**Our IT assets.** We only use MTG’s company email, intranet and internet connectivity and devices for legitimate and authorized business purposes. Limited private usage is fine too – as long as it does not adversely impact our work or contradict this Code of Conduct. We do not access, display, download or share inappropriate content or information when using our IT environment. This applies to material that is illegal, offensive, harassing, racially or sexually discriminatory, or otherwise inconsistent with a professional and ethical environment. We are careful when opening attachments or links in emails or on sites that are not related to our business, or from any source that we do not recognize. Using personal software on a work computer, or modifying our software, is a security risk and requires the approval of the IT department.

**Confidential information.** As part of our work, we may have access to information about MTG that is not available to other people within and outside the organisation. This could include financial data, business plans, contracts, and customer or supplier details. If the information is not public, it must be treated as restricted, confidential or secret depending on its sensitivity. We protect confidential information from improper use and do not share it – even with colleagues – unless authorized to do so.

**If we leave MTG.** If we move on, it is time to return all MTG assets in our possession. After we leave, confidential information remains confidential.

**Who to contact with questions or concerns:** your line manager, local CEO, Security Champions or MTG’s Risk and Security department.
Never compromise ethics when doing business.

There is never a wrong time to do the right thing. We behave ethically towards everyone. Responsible content. We have an opportunity to use the power of storytelling to create positive impacts for people, society and the environment. We embrace principles such as freedom of expression, the right to privacy, editorial independence, and universal service accessibility. We promote plurality, diversity and inclusivity – our content reflects a wide range of perspectives and challenges stereotypes. We protect younger viewers through careful scheduling, and the provision of flexible tools such as PIN locks to enable adults to keep children safe from unsuitable material. We follow applicable laws regarding illegal and unsuitable content.

Anti-bribery and corruption. A bribe is not just cash in an envelope. It can be the provision of anything of value – including cash or equivalents, gifts, paid expenses, entertainment, favours or loans – in return for certain actions. We do not tolerate any form of bribery, corruption or inducement to act improperly. Everyone working for – and on behalf of – MTG is expressly prohibited from giving, offering or promising anything of value to obtain or retain business, influence business decisions or gain business advantage. The same goes for asking for, accepting or receiving a bribe. We will never face punishment of any kind for refusing to pay a bribe or for highlighting corruption – we expect such honesty and integrity of each other and those who we work with.

Conflicts of interest. We avoid and eliminate conflicts of interest. Examples of conflicts of interest include maintaining external directorships or significant shareholdings in suppliers, customers or competitors; employing family members or friends; or using a supplier in which a relative or close friend has a significant role or financial interest. We do not work – in any capacity – for another individual or entity in a way that could affect our ability to carry out our roles and responsibilities at MTG.
Fair competition. We compete vigorously but fairly. We are committed to free and open competition, and abide by the relevant competition laws wherever we do business. We expect the same high standards from each other. We never agree with a competitor to limit how we compete with one another. That means: no price fixing; no agreements to split markets or customers; and no bid-rigging arrangements with our competitors. Competition laws also prohibit the abuse of dominant market positions.

Doing business internationally. Most countries have adopted laws regulating international business activities. Some of these laws prohibit business dealings with specific sanctioned countries, companies or individuals. The rules may restrict transfer of assets, monetary payment or provision of services to these sanctioned countries or parties. We make sure that we know our business partners—including who owns or controls them, what business they do and where, and their reputation.

Representing MTG. Wherever we are in the world, we always behave as ambassadors for MTG, and we respect local cultures at all times.

Interacting with partners and suppliers. We respect human rights and the interests of MTG employees and third parties—and we only work with partners and suppliers that do the same. We ensure that current and prospective partners and suppliers are aware of—and act in accordance with—our Supplier Code of Conduct.

Who to contact with questions or concerns: your line manager, local CEO or legal department, MTG’s Group Compliance Officer or MTG’s Corporate Responsibility department.

We do not give or accept bribes

We compete vigorously but fairly

We act with honesty and integrity
Handling information the right way

We work responsibly when handling personal data

We keep inside information in-house

We let our communications teams take the lead on communication

We respect the right to privacy. We keep reliable records and ensure accurate communication. And insider trading is always out.

Data protection. Everybody has the fundamental right to privacy, and we respect this right at all times. We protect all personal data entrusted to us, and we comply with all data protection laws and regulations wherever we operate. We hold and process personal data about our employees and customers for administrative and commercial purposes. The definition of personal data is very wide and can include name, address, phone number, date of birth, social security number, bank account information, IP address and device ID. We only collect, access or process personal data that we need to conduct our business, and only for the purpose for which it is intended. We also ensure the data is always kept secure.

Insider trading. If we have access to information about MTG (or about a customer, partner or supplier) that is not available outside the company, and this information would be likely to have a significant effect on MTG or another company’s stock price if it was made public, then we do not share this information, or conduct any transactions based on this information, or suggest that anyone else conducts such transactions, or change any orders that have already been placed.

Who to contact with questions or concerns: your line manager, local CEO or legal or communications department, MTG’s Group Compliance Officer or MTG’s Group Data Protection Officer.
Raising concerns

We take all concerns seriously

We speak up without fear of negative repercussions

Our independent reporting system enables confidential reporting

We do business honestly and with integrity. If we have a concern, we speak up – and we expect each other to do the same.

A culture of openness. MTG promotes a culture of openness, responsibility and accountability. We want everyone to feel comfortable about raising concerns. We expect you to tell us immediately if you believe a violation of our Code of Conduct or applicable laws has taken place or will take place in the future. Doing so makes an essential contribution to the sustainability of our culture. We can raise any matter of concern without worrying about a negative reaction. Our concerns will be taken seriously and investigated appropriately. Managers are responsible for encouraging an open dialogue, and for supporting employees by addressing all concerns in a fair and unbiased manner.

How to raise concerns. MTG encourages employees to raise concerns at the earliest possible stage, and through the usual reporting lines as appropriate. We have a grandfather principle whereby we can raise concerns with our manager’s manager if we do not believe that the concern has been, or will be, dealt with appropriately. We can also report incidents using our whistleblower procedures. These include an independent, confidential reporting system, which enables us to report anonymously at any time via free phone numbers or online. More information about our whistleblower procedures can be found on HIVE:

https://mtg.jiveon.com/groups/whistle
Our Code is our compass

We are each responsible for familiarizing ourselves with this Code of Conduct, and for seeking guidance if we are unsure whether a particular course of action is the right one. The ethics checklist to the right is a helpful tool. In addition to this Code of Conduct, MTG has adopted Group policies providing further information in the areas covered by this Code. They are available at:

https://mtg.jiveon.com/groups/policies-and-guidelines/overview

Our Code is our compass in situations we face on a daily basis. Always start by asking yourself these three questions, and never hesitate to seek guidance.

For more information, please contact MTG’s Group Compliance Officer:
compliance@mtg.com

Or MTG’s Corporate Responsibility department:
responsibility@mtg.com
Appendix I – form of acknowledgement

Note: Acknowledgement should primarily take place electronically. If you use paper acknowledgement, please give the signed copy to your local HR representative.

I, the undersigned, certify that I have received and read the MTG Code of Conduct, and that I understand my responsibility to comply with this Code.

I understand that my agreement to comply with this Code does not constitute a contract of employment.

Date

Signature

Name

Company