**Anti-fraud & Anti-corruption policy**

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### DOCUMENT INFORMATION

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1. Object

The purpose of this Policy is to establish a framework to evaluate and minimize the risk of fraud and corruption in Mediapro Group's business activities and to establish the company's firm stance against fraud and corruption of any kind, in accordance with the applicable regulations in law, ethical commitments and the Group's Code of Conduct.

2. Scope

This policy is applicable to all professionals of all units, Areas and Sub-Areas of the Mediapro Group (hereinafter "persons subject to the Group"). Similarly, it is applicable to each of the companies that make up the Mediapro Group, over which the company exercises effective control, without prejudice to possible adjustments at the international level, in accordance with the legislation and regulations of each country of reference.

3. Effective date

This document will become effective on the day following its approval by the Board of Directors of JOYE MEDIA S.L. (Holding of the Mediapro Group) and must be reviewed annually by the Compliance Area which will evaluate whether the content of the policy is still effective for meeting objectives set by the Group or if, on the contrary, any modification is required. to ensure its continued effectiveness, taking into account the relevant developments and the evolution of international and sectoral standards.

4. Definitions

- **Mediapro Group**: The Mediapro Group or 'Group' is understood to mean all those companies over which the parent company Joye Media SL has control, either directly or indirectly.
- **Corruption**: is dishonest or fraudulent conduct of people in positions of power which normally implies the existence of bribery. When referring to corruption, one can distinguish between passive corruption and active corruption:
  - Passive corruption is understood here as when an individual solicits, receives or accepts benefits or unjustified advantages.
  - Active corruption is carried out by those who promise, offer or grant such benefits or advantages.
- **Fraud**: is a dishonest act or omission made with the intention of acquiring money or other kinds of goods through the alteration, manipulation or falsification of Group books, records and accounts.
- **Extortion**: extortion occurs when someone uses violence or intimidation to compel another person to perform or omit an act contrary to their will in order to obtain some benefit, usually of a lucrative nature.
- **Hospitality**: understood here as hospitality offered to third parties on the occasion of a business activity, such as the offer of coffee, invitations to lunches or dinners or the provision of means of transport within the framework of events included under the concept of corporate hospitality.
- **Bribery**: Bribery is defined as conduct that implies gifts, benefits or advantages of any nature that are not justified, in exchange for an unfair advantage. The payment of a sum of money is not the only act considered a bribe, but also includes conduct such as favours, benefits or personal attention provided to third parties directly or indirectly related to a customer, supplier, public official or any other person or individual or legal entity that has or could potentially have a professional
relationship with the Group and that could be perceived as a way of influencing decision-making or conduct.

✓ **Bribing a civil servant or authority:**
  
  o Offering or giving gifts, favours or services under advantageous conditions to a public official or a third party linked to a public official (e.g. relatives, business associates, etc.).
  
  o This conduct is criminal whether the gift or favour is offered or delivered on the initiative of the benefactor, or if it is in response to a request from the public official.
  
  o This conduct will be considered criminal whether the gift or favour is offered or delivered to obtain or reward an action by the official for the benefit of the person or company that provides it, or whether said gift or favour is produced solely in consideration of the position or function of the official.
  
  o Conduct of this nature is punishable by serious penalties for both the individual (up to 6 years prison under Spanish law) and for the company in whose name the individual acts (fines, suspension of activities, prohibition of access to public procurement, etc.).
  
  o Only hospitality or gifts to public officials that take place in the context of socially admitted courtesy practices remain outside the previous prohibition.

✓ **Public official or Authority:** An **Authority** is understood as being that which, by itself or as a member of any corporation, tribunal or collegiate body, exercises command or independent jurisdiction. In any event, the following persons are understood as authorities: members of the Parliament, the Senate, Autonomous Communities Legislative Assemblies, European Parliament, as well as officials of the Public Prosecutor's Office. A public official is considered to be any person who, by virtue of Law, by election or by appointment of the competent authority, participates in the exercise of public functions, including but not limited to the following: mayors; councillors; municipal technicians; elected members of the municipal plenary sessions; autonomous presidents and advisers; elected members of an autonomous or regional parliament; employees of local, autonomous or regional and state public administration; administrators, managers and employees of municipal, autonomous, regional or state commercial companies and other analogous positions of discretionary appointment; judges, magistrates, prosecutors and court clerks; officials attached to institutions of the European Union and national officials of other EU Member States, national public officials of any other State, officials or employees of an international public organization or its agencies or departments (United Nations, World Bank) etc.

✓ **Facilitation payments:** Facilitation payments are payments of small sums of money to public officials to facilitate or accelerate the performance of non-discretionary acts or services, for example, obtaining licenses, visas, work permits or customs clearance. Payments of a legal or regulatory nature to an official body established for this purpose, for example, the payment of fees and public prices, is not considered a facilitation payment.

✓ **Gift:** Any item of value constitutes a gift or hospitality. This concept includes any kind of direct or indirect consideration, from objects of economic value, money in cash or transfers, investments, free participation in conventions, invitations to events, trips and stays in hotels when the inviter does not attend the event or trip, promises of employment, hiring of third parties (relatives or friends of those whom are to benefit), etc. Whenever such gifts exceed the standard practice of courtesy, they will be susceptible to constitute bribery or corruption among individuals and, therefore, must be offered and accepted in adherence with the prudential standards established in this policy.
Influence-peddling: Consists in influencing a public official or authority taking advantage of a prior personal relationship with the public official or authority or another official, to obtain a resolution beneficial to the influencing person or company or any third party.
  o It is considered of equal criminal conduct to request or accept any remuneration or reward in exchange for offering to exercise undue influence over an official or authority.
  o Conduct of this nature is punishable for both the individual (up to 2 years prison under Spanish law) as well as for the company in the name of which the individual may act (fines, suspension of activities, prohibition of access to public procurement, etc.).

5. Responsibilities

The Executive Committee is responsible for:

✓ Regulating procedures and controls regarding sponsorship and donations, in accordance with Policy provisions.
✓ Being aware of relevant procedures with Public Administrations by professionals or managers of the Group.

The Steering Committee is responsible for:

✓ Transferring Policy to the rest of the Mediapro Group and ensuring compliance therewith.
✓ Reporting to the Compliance area in the event that Area professionals have regular professional relationship with public officials.

The Corporate Compliance Officer (CCO) is responsible for:

✓ Approving the forms of reception or delivery of gifts and hospitalities that exceed the limits established in Appendix 2 of this Policy.

The Compliance Area is responsible for:

✓ Disseminating Policy and monitoring application and compliance.
✓ Developing Policy on the basis of regular risk assessment to address the Group’s specific circumstances, in particular the risk of bribery it is exposed to.
✓ Approving the delivery of anything of value between Mediapro Group employees and public officials or authorities, in accordance with the policy.
✓ Together with the Group’s Compliance Officers, as well as Compliance Delegates (CD), the Area must develop a plan to ensure effective and adequate communication of the Policy and current anti-corruption legislation to all Group employees.
✓ Addressing Compliance-related inquiries.

All employees and members of the Mediapro Group are responsible for:

✓ Notifying all agents with any relationship with the company about the Policy so these can accept the conditions specified.
✓ Refusing to accept or offer bribes or other illicit transfers deriving from their professional activity.
✓ Respecting stipulated corporate procedures when contracting with clients.
✓ Adhering to impartial decision-making procedures and notifying the Compliance area in the event of doubt.
✓ Reporting to Area Managers concerning standard professional relationships with public officials, either directly by persons of the Group or indirectly through agents, consultants, law firms, etc.
✓ Requesting prior consent from the party responsible and/or CCO before accepting or giving gifts or hospitality that exceed the established limits to third parties.
✓ Reporting any potential breach of the Code of Conduct and Group policy.

### 6. Guiding Principles

#### 6.1 Key aspects of Anti-fraud and Anti-corruption Policy

##### 6.1.1 Bribery and extortion

The persons subject to the Mediapro Group cannot offer or accept bribes or unlawful advantages in the relationships derived from their professional activity, such as in dealings with authorities, Government officials, customers, suppliers or in commercial transactions. Corruption cannot be justified under the assumption that it benefits the commercial interests of the Mediapro Group.

##### 6.1.2 Gifts and hospitality

The following practices are forbidden under any circumstance:

- Gifts in cash or cash equivalents (gift vouchers or purchase vouchers).
- Financing costs of leisure activities, travel expenses and similar of companions or guests to business meetings.
- Gifts which are not in good taste or that involve visiting locations deemed inappropriate for conducting professional relationships.
- Gifts delivered during or immediately after a process of awarding any contract or tender in which the Mediapro Group participates.
- Any gift that might be in breach of any law, local regulation or rule of the recipient's organization. If there is any doubt in this regard, the recipient should be asked to confirm in advance whether the acceptance contravenes any applicable rule and that it has been authorized.
- Facilitation payments.

In the event that making a payment is the only possible option in a context of serious and imminent risk to the health or safety of a member of the Mediapro Group, the foregoing prohibition may be exempted. In this case, the incident must be notified to the Compliance Area as soon as possible and in writing indicating the amount of the payment and the motivating circumstances, although prior approval will not be required when dealing with a security emergency.

In any case, any recipient or benefactor of gifts or hospitality should question whether these might compromise their independence, integrity and/or honesty of the benefactor or recipient when it comes to business decision-making (e.g., in the In case of being responsible for the retransmission of a sporting event and receiving an invitation to the event, the individual’s independence, integrity and/or honesty would not be compromised since this would fall within the individual’s scope of responsibility to supervise the television broadcasting of the event itself). In the event of doubt, you should always consult the Compliance Area.
6.1.3 Gifts and hospitality offered to public officials

Regardless of whether or not it can be considered a bribe, the transfer of any item of value (gifts and presents) to public officials or authorities requires prior approval of the Area/Department Head and the Corporate Compliance Officer, whatever the amount. In order to assess the adequacy of a gift to a public official, the definition of this policy must be taken into account.

In the Group's dealings with national and/or foreign Public Officials, this Policy will be applied in its entirety, given that Public Officials are also subject to specific regulations governing incompatibilities and prohibitions given their position.

In cases where dealing with Government Bodies occurs in accordance with procedures governed by external regulations, these regulations will be adopted as the reference for such dealings and shall be considered of mandatory compliance.

In our dealings with public officials and public authorities, any conduct that might be misinterpreted as an attempt to obtain undue compensation should always be avoided.

In any dealings with Government Bodies that imply or may directly or indirectly imply the assumption of economic commitments by Mediapro Group or subsidiaries thereof, there must always be a clear separation of functions between the person who negotiates the deal and those who manage and authorize payment thereof, ensuring participation of both parties in the process.

In economic dealings with Government Bodies, sufficient traceability must be ensured regarding the origin and destination of funds and transparency regarding the nature of any contracts that may exist between the parties.

All members of Mediapro Group who have regular dealings with civil servants or public officials whether directly by Group employees or indirectly through representatives, consultants, law firms, etc., must register on the Registry to be set up for this purpose.

The Compliance Area shall act as the custodian of the Registry and is responsible for ensuring it is updated at all times to reflect the relationships and dealings with all Group companies by sending regular questionnaires regarding the reasons for the meetings as well as identifying public officials and authorities who have attended meetings.

Persons subject to the Mediapro Group who must interact with the Government Bodies must have prior authorization to do so from their immediate superior management level. In addition, before contacting a Government Body, the subject must firstly notify their immediate superior directly.

Those responsible for each of the areas, sub-areas or corporate or business departments of the Mediapro Group in Spain and abroad are required to notify the Compliance Area via e-mail with the complete list of those persons empowered to maintain contact with Government Bodies, in accordance with the model annexed at the end of this policy (Appendix 3).

This list must be sent twice a year, once in January-February and again in June-July.

For transactions or operations deemed to be of a more sensitive nature, special controls consisting in maintaining adequate documentation support must be implemented in order to guarantee the transparency of all dealings with Government Bodies and maintain the Registry updated at all times in relation to the persons contacted. All documentation exchanged in these operations must be kept for safekeeping and in every case, must reflect the operation and economic value involved, as well as any other sensitive information.
The following are deemed operations of a more sensitive nature:

- Participation in national and foreign public tenders.
- Participation in procedures for obtaining subsidies and public assistance by national, community or foreign public bodies.
- Participation in procedures for obtaining licenses or administrative authorization granted by Government Bodies and relevant to the Mediapro Group.
- Dealings with public employees who exercise independent decision-making that may entail direct economic advantages for the Group and which is not governed by external regulation.

6.1.4 Fight against Fraud

Mediapro Group operates a system of financial and accounting procedures, including appropriate internal accounting controls designed to guarantee conscientious and accurate book-keeping and maintenance of records and accounts and to ensure a reliable and complete record of all economic transactions performed by the company in Spain as well as abroad.

For this purpose, the Group will design a system that provides reasonable guarantees that: a) transactions are performed in accordance with general or specific authorization from Management; b) transactions are recorded accordingly to meet requirements for the preparation of financial statements in accordance with generally accepted accounting principles or any other criteria applicable to such statements, and to maintain responsibility for assets; c) access to assets is only permitted in adherence with general or specific authorization from the Management and d) entries regarding assets recorded in accounts are compared with existing assets at reasonable intervals and appropriate measures are taken with respect to differences.

Internal control systems are subject to regular review and audit in order to ensure security level compliance regarding design, implementation and effectiveness.

6.1.5 Donations to political parties

Donations to political parties and associated foundations are prohibited. Debt compensation agreements can only be reached with political parties and associated foundations when permitted by law and the agreement is in accordance with the Group's general risk criteria.

The potential participation of Mediapro Group in lobbies that interrelate with political Institutions will be performed within the framework of the operational principles as established in the Code of Conduct and in compliance with this Policy.

6.1.6 Donations to non-governmental organizations, individuals and legal entities

Donations to foundations and other non-governmental organisations or to individuals or legal entities must be in accordance with the lines of action established in the Group's charitable activity with the appropriate procedures being established for this purpose.
These procedures will include controls to prevent donations and contributions from being used as a subterfuge to engage in practices in breach of this Policy and the Code of Conduct, including the following precise limits and authorization required:

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<th>DONATION AMOUNT*</th>
<th>APPROVAL</th>
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<td>Up to €1,000</td>
<td>Written request and approval from Area/Department Head and Corporate Compliance Officer</td>
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<tr>
<td>Between €1,001 and €10,000</td>
<td>Approval required from Executive Committee</td>
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<tr>
<td>Over €10,000</td>
<td>Approval required from Board of Directors</td>
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When an activity is carried out in a decentralized manner, the company will at all times act in accordance with the criteria established in the foregoing section.

6.1.7 Dealings and relationships with third-parties

The Mediapro Group, through the persons subject to the Group and in compliance with due diligence and compliance requirements based on the risk inherent in its activities, is required to disclose to all its customers, suppliers, subcontractors, agents and collaborators the terms of this Policy: these terms must be accepted by them at the time of signing the corresponding contracts.

6.1.6.1 Contracting with clients

The Group implements policy regarding the relationship with clients that must be respected by all the people who make up the Group, and contracts with clients can only be signed by administrators or professionals with powers to do so (as stipulated in the Group’s “Proxy Structure Policy”) who must perform the mandatory risk analysis in each case.

6.1.6.2 Contracting with suppliers, subcontracts or other agreements with third parties

Contracting and subcontracting between the Group and a supplier is regulated under the “Proxy Structure Policy" and "Procurement Policy", as well as any other policy that may be applicable.

Similarly, the inclusion of a standard clause concerning Group policy on conflicts of interest and anti-corruption in all contracts entered into is mandatory, as well as including reference to compliance with Code of Conduct, either that of the Mediapro Group or that of the supplier provided that it meets the criteria of Mediapro Group.

6.1.8 Conflicts of interest

A conflict of interest is taken here to mean any situation in which the interests of external, financial, family, political or personal businesses could interfere in the judgment of the members of the organization in the exercise of their professional duties.

Mediapro Group is committed to acting in such a way that business decision-making is carried out with impartiality and objectivity, without allowing other interests beyond those of the organization to influence its criteria. In the event of any doubt about a possible case of conflict of interest, employees are required
to notify the incident using the Compliance e-mail address which appears on the company's corporate website (preguntascompliance@mediapro.tv).

6.1.9 Sponsorship and commercial attentions

Sponsorship activity is designed to target granting financial aid to the sponsored party to perform sporting, charitable, cultural, scientific or similar activities in exchange for the recipient party’s commitment to collaborate in Mediapro Group’s advertising activity. In any case, sponsorship activity should be aimed at strengthening the Group brand and business interests.

The Executive Committee must review procedures and controls in place to prevent the performance of any activity in the name of Mediapro Group that might be in breach of this Policy. When sponsorship activity is carried out in a decentralized manner, the company will at all times act in accordance with the criteria established in the foregoing section.

6.1.10 Promotional and marketing expenses

Expenses allocated to promotional and marketing activities are also subject to measures of reasonableness and frequency in relation to the same beneficiary or issuer, as well as to criteria established in the previous section insofar as this applies. In any case, once the €1,000 limit per beneficiary-issuer/year has been exceeded, authorization from the Group’s Executive Committee will be required for further initiatives.

6.2 Approval

Mediapro Group employees must request prior written approval from the person in charge of the unit, area or sub-area to which they belong and, where appropriate, Corporate Compliance Officer through the “Form for receipt or delivery of Gifts and Hospitality” before offering, giving, promising or receiving gifts or hospitality for any person or entity that exceeds the limits established in Appendix 1 to this policy.

6.3 Communication and awareness raising

Mediapro Group’s Compliance Area must ensure that all members of the Group are aware of and apply this policy.

Similarly, all Group employees are encouraged to consult and communicate any Compliance-related issues that may occur within the Group.

Moreover, in coordination with the Group’s Compliance Area, Compliance Delegates (CD) operate and execute a plan for communicating the requirements of this policy and applicable anti-corruption legislation to all Mediapro Group employees.

Employees can notify Compliance-related issues through any of the following channels:

1. Send the report to the Compliance Area e-mail address: reportescompliance@mediapro.tv.

2. Fill in the form available from the Corporate Portal, under the Corporate Compliance section. In this case, the system itself will automatically send an e-mail to the "Compliance reports" address displaying the fields of the form that have been filled out.
Additionally, any questions or queries related to any other Compliance issue, can be directed to the following e-mail address: preguntascompliance@mediapro.tv.

6.4 Penalties for non-compliance

Failure to comply with this policy, in addition to the serious criminal penalties that may be incurred by the company, directors and employees, is subject to the corresponding administrative and/or labour-related sanctions as applicable under current labour regulations or collective agreements.
APPENDIX 1 (Specifications - ARGENTINA)

1. Object

The purpose of this Appendix to the Anti-fraud & Anti-corruption Policy is to establish the specific aspects governing this issue in Argentina and, together with the Anti-Fraud and Anti-Corruption Policy of the Mediapro Group, will serve to evaluate and mitigate the risk of fraud and corruption in the business activities of Mediapro Group companies located in Argentina, establishing the firm stance of Argentinian companies against fraud and corruption, in accordance with the applicable legal system, ethical commitment and the Group’s Code of Conduct.

2. Scope

This appendix is applicable to all management, workers and/or employees of all Units, Areas and Sub-Areas of Mediapro Group companies located in Argentina (hereinafter "persons subject to the Group"), as well as representatives, agents and contractors.

In Argentina, based on the sanction included under Law 27.401, the actions of the aforementioned individuals may result in criminal liability of the legal entity.

3. Effective date

As an Appendix, this document is an integral part of the Mediapro Group’s Anti-fraud & Anti-corruption Policy and will become effective the moment it is approved by the Board of Directors of Joye Media, S.L. (Holding of the Mediapro Group). The Policy is subject to mandatory yearly review by the Compliance Area to evaluate whether the content of the Appendix for Argentina remains valid to achieve the objectives set by the Group or whether, on the contrary, amendments are required to guarantee its continued effectiveness, taking into account the relevant developments in the field and the evolution of international standards and the sector.

4. Definitions

In addition to the definitions included in Mediapro Group’s Anti-fraud & Anti-corruption Policy, the following definitions will also be taken into account for Argentina:

- **False accounting – balances falsos**: refers to the publication, certification or authorization of false or incomplete inventories, balances, profit and loss accounts or the corresponding false or incomplete reports or minutes concerning important facts required to fully understand a company’s economic situation, regardless of the intended purpose.

In Argentina, this conduct is aggravated when carried out for the purpose of hiding the commission of crimes against Government Bodies as outlined in Law 27.401.
5. Specifications - ARGENTINA

On December 1, 2017, the Corporate Criminal Liability Law was published in the Official Gazette for the following offenses against Government Bodies:

i. National and transnational bribery and influence peddling, (articles 258 and 258 bis of Argentine Criminal Code – “ACC”);
ii. Negotiations incompatible with the exercise of public functions (ACC article 265);
iii. illegal exaction committed by a public official for their Benefit (ACC article 268);
iv. Illicit enrichment of public officials and employees (ACC articles 268 clauses 1 and 2); and
v. false balance sheets and reports (ACC article 300 bis).

Consequently, when any management, workers and/or employees of Mediapro Group companies located in Argentina, and/or whoever acts on their behalf, is the author, co-author, accomplice or instigator of any of the offenses listed, their actions may incur criminal responsibility for the company they represent.

Similarly, any gift to a public official can be interpreted as the crime of bribery as stipulated and forbidden under Argentine Criminal Code article 259 and, if interpreted as also constituting any of the crimes as outlined under Law 27.401, this could also entail criminal responsibilities for Mediapro Group companies located in Argentina.

In their dealings with the private sector, Mediapro Group company employees in Argentina may only deliver gifts or invitations up to a maximum amount of €60 or the equivalent in Argentine pesos, on the date of the expense. If the gift or invitation exceeds the amount indicated, acceptance will be subject to prior authorization from the person responsible for the applicant and, where appropriate, the Corporate Compliance Officer (See limits for receiving / delivering gifts in Appendix 1 of the Mediapro Group Anti-fraud & Anti-corruption Policy).

In Argentina, gifts to public sector employees are forbidden.

All gifts made by employees of Mediapro Group companies based in Argentina must be:

(i) made in good faith,
(ii) symbolic or modest (not luxurious or extravagant),
(iii) reasonable and appropriate,
(iv) occasional,
(v) in accordance with reasonable commercial practice/for commercial purposes only, and
(vi) in accordance with the laws and regulations in force.

Although a gift or invitation might be intended with the purest motives of personal or professional friendship, these can be misinterpreted and represent undue influence.

The term “gifts” is understood as meaning not just gifts or invitations, but also any preferential treatment. Personal gifts, tickets to shows or events that are not business-related are therefore prohibited.

1 Effective as of March 2, 2018.
APPENDIX 1 (*Limits for receiving and giving gifts*)

### PRIVATE SECTOR

<table>
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<tr>
<th>AMOUNT*</th>
<th>REQUIREMENTS</th>
<th>EXAMPLES</th>
<th>CONSIDERATIONS</th>
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<td>Up to €60, with a limit of €600 per Area/issuer-recipient/year</td>
<td>No authorization required. All expense receipts/invoices must be provided.</td>
<td>Business lunch/dinner associated with business activity or event. Promotional gifts.</td>
<td>Must be standard and fitting with the occasion.</td>
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| €61 - €300, with a limit of €1,500 per Area/issuer-recipient/year | Requires written application and approval from area/department head. All expense receipts/invoices must be provided. | Invitations to business events (including socially acceptable hospitality) Invitation to other events (cultural, sporting, leisure and entertainment) | Must be standard and fitting with the occasion. Receipt/delivery of gift cannot influence in any specific business decision-making process. |

| Over €300, with a limit of €1,500 per Area/issuer-recipient/year | Requires written application and approval from area/department head and Corporate Compliance Officer. All expense receipts/invoices must be provided. | Invitations to business events (including socially acceptable hospitality) Invitation to other events (cultural, sporting, leisure and entertainment) | Must be standard and fitting with the occasion. Receipt/delivery of gift cannot influence in any specific business decision-making process. |

### PUBLIC SECTOR

<table>
<thead>
<tr>
<th>AMOUNT</th>
<th>REQUIREMENTS</th>
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<tbody>
<tr>
<td>Any amount, with a limit of €1,000 per Area/issuer-recipient/year</td>
<td>Requires written application and approval from Area/Department Head and Corporate Compliance Officer. All expense receipts/invoices must be provided.</td>
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- For countries where the currency is not the euro (€) please apply the going exchange rate at the time of submitting the application or acceptance of the gift in question.
- **Warning!** Certain countries expressly prohibit the giving of gifts to civil servants and public service employees.

If you are in doubt, please contact us at: preguntascompliance@mediapro.tv

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2 any item of value is considered a gift or hospitality
APPENDIX 2 (Application for authorization reception/delivery of gifts)

SOLICITUD AUTORIZACIÓN (Por favor, marque una sola opción)
- RECEPCIÓN REGALOS
- ENTREGA REGALOS

A cumplimentar si el regalo supera los 60 € o si se dirige a funcionario o autoridad pública.

<table>
<thead>
<tr>
<th>NOMBRE Y APELLIDOS SOLICITANTE</th>
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<tbody>
<tr>
<td>DNI</td>
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<tr>
<td>DEPARTAMENTO</td>
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<tr>
<td>EMPRESA DEL GRUPO</td>
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<tr>
<td>TEL/EXT.</td>
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<tr>
<td>MAIL</td>
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FECHA SOLICITUD

<table>
<thead>
<tr>
<th>EMISOR/RECEPTOR DEL REGALO</th>
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<tbody>
<tr>
<td>CARGO</td>
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<td>EMPRESA A LA QUE PERTENECE</td>
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SOLICITO AUTORIZACIÓN (Por favor, haga una descripción detallada del regalo u hospitalidad)

MOTIVOS (Por favor, explique brevemente los motivos del regalo u hospitalidad)

<table>
<thead>
<tr>
<th>IMPORTE APROXIMADO DEL REGALO</th>
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<tbody>
<tr>
<td>EUR</td>
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LE CONSTA ALGÚN REGALO A LA MISMA PERSONA EN LOS ÚLTIMOS 12 MESES?

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EN CASO AFIRMATIVO, INDIQUE TIPO DE REGALO

Firma del solicitante

Firma del responsable

APROBACIÓN COMPLIANCE SI EL REGALO SUPERA LOS 300 € o SE DIRIGE A FUNCIONARIO O AUTORIDAD PÚBLICA (A rellenar por el Corporate Compliance Officer)

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Motivo:

FECHA APROBACIÓN

Firma del Corporate Compliance Officer
## APPENDIX 3 (List of persons authorized to liaise with Government Bodies)

<table>
<thead>
<tr>
<th>GROUP COMPANY OR CORPORATE AREA</th>
<th>APPOINTED PERSON</th>
<th>APPOINTED PERSON'S POSITION</th>
<th>APPOINTED PERSON'S MAIL</th>
<th>IMMEDIATE SUPERIOR</th>
<th>GOVERNMENT BODY</th>
<th>PURPOSE</th>
<th>ASSOCIATED ESTIMATE (If applicable)</th>
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<th>DATE UNREGISTERED</th>
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