

ATRESMEDIA



Code of conduct

Atresmedia

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Introduction

This Code of Conduct provides a general description of the policies, principles, objectives and values of Atresmedia, which are considered necessary and essential for its global success and for strengthening its presence in society.

The Atresmedia Group is working toward the objective of being recognised and appreciated as a prestigious, independent, profitable and influential multimedia communications group.

The Code of Conduct is designed to be part of a set of internal standards that define, in a public and structured manner, the corporate culture of Atresmedia, in order to make the values of the company explicit and visible, and to unify and strengthen the identity, visibility and conduct guidelines of Atresmedia. The existence of a shared culture, with aspirations for the future and deeply rooted on values that are common to the entire organisation, strengthens the virtues and competencies of Atresmedia and contributes to creating value for the shareholders and stakeholders.

The Board of Directors Atresmedia Corporación de Medios de Comunicación, S.A., the holding company of Atresmedia, promotes, safeguards and supervises the commitment to adhere to and ensure compliance with this Code of Conduct, applying it at all times to all its activities and sectors of activity, to internal relationships and relationships with third parties, as a complement to the strict fulfilment of the applicable legislation in force from time to time.

From a methodological point of view, the Atresmedia Code of Conduct provides a unique and systematic response to the main eventualities and circumstances that any of its employees could face. Although the Code does not aim to anticipate all the potential scenarios that might actually arise, it does aspire to become an accessible reference tool, which serves to orientate and guide the behaviour of our employees in matters of a social nature, as well as to detect and prevent any situation from which any corporate, environmental or ethical liabilities may arise, which due to their relevance, content and implications are of particular importance for Atresmedia.

The shared respect and personal commitment of all those parties involved should ensure that the provisions of this Code are consistently applied on an ongoing basis, thus contributing to the consolidation, improvement, progress and growth of Atresmedia.

Atresmedia's reputation, its credibility as a media group, its editorial independence, its financial profitability, the support of its viewers and listeners, and the sustainable and overall success of the Group are largely dependent on the condition that all members of this organisation carry out their work in an honest, civic, ethical, honest and transparent manner, with a common set of objectives, professional dedication, high ethical standards and a spirit of cooperation. The Code of Conduct forms part of the Good Governance, Regulatory Compliance, Crime Prevention and Corporate Responsibility Policies of Atresmedia, the establishment and ultimate supervision of which is the exclusive responsibility of the Board of Directors of Atresmedia Corporación de Medios de Comunicación, S.A., assisted by the Audit and Control Committee. Consequently, the Board of Directors of Atresmedia Corporación de



Medios de Comunicación, S.A. shall be responsible for the management and supervision of all matters related to its effective compliance, and shall be obliged to adopt and implement any measures that may be appropriate for the necessary coordination of the Code with the rest of the corporate governance rules and procedures that share the same values and objectives as the Code. The Board shall also be responsible for encouraging such measures as may be necessary from time to time to ensure the continuous improvement and updating of the Code of Conduct.

The directors, senior executives and managers of Atresmedia are also bound by the provisions contained in this Code of Conduct, without prejudice to other specific and additional obligations, requirements and duties established by generally applicable legal provisions, the self-regulatory codes endorsed by Atresmedia or any other specific internal rules, such as the Regulations of the Board of Directors or the Internal Code of Conduct on Stock Market related matters.

For the purposes of this Code of Conduct:

- Directors will be understood as the members of the Board of Directors of Atresmedia Corporación de Medios de Comunicación, S.A. and the directors of the Group companies.
- Senior executives will be defined as those individuals who report directly to the Chief Executive Officer of Atresmedia Corporación de Medios de Comunicación, S.A. or any executive director of the Company.
- Executives will be understood as those persons who report directly to any senior executive.

In this Code of Conduct, all those individuals indicated above shall be collectively referred to as “employees”, unless it is expressly stated otherwise.

In order to supervise, control, coordinate and integrate these corporate policies, which are necessarily convergent, Atresmedia has established a single, collegiate operational structure, made up of representatives from all the areas concerned, called the Regulatory Compliance Committee (“Comité de Cumplimiento Normativo” or “CCN”). This Committee must manage these responsibilities with the necessary efficiency and independence, collegial responsibility, technical discipline and budgetary rigour, using the general and specific powers vested in it by Atresmedia's Internal Regulations and the technical and human resources deemed necessary from time to time.

The CCN reports hierarchically to the Audit and Control Committee of the Board of Directors, without prejudice to any information that may have to be provided to other bodies or committees of the Company and the Group as a whole.

1. Object

The purpose of this Code of Conduct is to establish the policies, principles, objectives and values that should guide behaviour within Atresmedia and in the company's relations with third parties and society as a whole, consolidating a culture and a set of guidelines for responsible behaviour that are shared, accepted and respected by all those individuals to whom it applies. The Code also aims to guide the internal relations between these



individuals and their relations with the rest of their stakeholders, translating Atresmedia's values, as hereinafter defined in the section *Purpose, Mission, Vision and Values of Atresmedia*, into regulated, measurable and predictable practices.

In addition, certain protocols and obligations have been incorporated into the Code of Conduct in order to exercise due control over the activities carried out by Atresmedia, with the aim of preventing, detecting, correcting and prosecuting any behaviour that may give rise to any type of criminal liability.

For the purposes of this Code of Conduct, Atresmedia shall be understood to mean: (i) the Group that includes Atresmedia Corporación de Medios de Comunicación, S.A. (hereinafter referred to as the "Company"); (ii) all subsidiaries and associated companies that, in relation to the former, are in the situation provided for in Article 42 of the Code of Commerce (hereinafter referred to as the "Group"); and (iii) the Atresmedia Foundation.

2. Purpose, Mission, Vision and Values of Atresmedia

Atresmedia's corporate purpose "We believe in the power of reflection and emotion" expresses the Group's *raison d'être*. The news and entertainment content that the Group creates and broadcasts generates reflection and emotion, which are levers that contribute to the generation of criteria, integration and social awareness, thus promoting a positive impact on society.

The corporate purpose complements the mission, vision and values that guide Atresmedia's activities.

Atresmedia's primary mission is to deliver a pluralistic, innovative and high quality news and entertainment offering that meets the needs of our stakeholders, in order to earn their trust and achieve leadership and sustainability.

Our vision is to become the independent multimedia communications group of reference, making a valuable and positive contribution to the society in which the company operates.

The values shared by Atresmedia's employees are commitment to society, quality, creativity, long-term vision, innovation, diversity, leadership, individual and collective responsibility and teamwork.

This Code of Conduct is intended to serve as an indisputable reference for all of Atresmedia's activities and to be used as a guide for the conduct of its employees. In addition, Atresmedia will generally encourage the dissemination of this Code among its stakeholders, including its customers, suppliers, advertisers, viewers and listeners, institutions, investors, competitors, regulatory bodies and shareholders.

3. Subjective scope of application

This Code of Conduct applies to all directors, senior executives, executives, employees, trainees, interns and, in general, to all persons who provide their services to Atresmedia (hereinafter referred to as "employees" or "Atresmedia employees"), regardless of the legal status that governs their employment or service relationship, the position they occupy within Atresmedia's organisational structure or the specific location where they perform their work.



All employees must be informed of and comply with all legal regulations that may be applicable to their professional activities, responsibilities and place of work. In any event, Atresmedia will provide them with the means required to become aware of and understand the legislation applicable to such employees in connection with the proper performance of their professional duties, as well as the appropriate training to ensure proper regulatory compliance. Employees shall fully respect the commitments and obligations assumed by Atresmedia in its contractual relationships with third parties.

This Code of Conduct shall also apply to the directors of Atresmedia Corporación de Medios de Comunicación, S.A. and of other Group Companies, without prejudice to the provisions contained in the Regulations of the Board of Directors, in the Internal Code of Conduct on Stock Market related matters (RIC) and, where applicable, in other agreements or internal rules of the Company that govern the duties of directors.

4. Communication and compliance

Atresmedia expects its employees and other related third parties to act with integrity, responsibility, honesty, transparency and in line with the principles contained in this Code.

No one, regardless of their position within Atresmedia, is authorised to ask an employee to violate the provisions of this Code of Conduct. No employee may justify a malpractice on the basis of an order from a superior that is contrary to the Code, nor on the basis of ignorance of the Atresmedia Code of Conduct.

Any violation of this Code of Conduct could jeopardise the interests of Atresmedia and compromise its reputation. For this reason, all Atresmedia employees are required to immediately report, in accordance with the procedures set forth in this Code, any violation or breach of which they are aware, and especially those that may constitute a crime.

In particular, employees who hold senior managerial or executive positions, or who perform audit and control functions, must report any violations of the law or the Code of Conduct that they come to their attention and which have been committed by other employees, using the whistleblowing procedure set forth in this Code of Conduct, through the Whistleblowing and Enquiries Channel.

Atresmedia will make the Code of Conduct available to those who join the company as employees, and will expressly inform them of their obligation to be aware of its contents and their responsibility to apply them.

Any potential infringements of the Code of Conduct will be analysed in accordance with the internal regulations, the applicable agreements and, where appropriate, the applicable legal provisions, pursuant to the procedure set out in this Code of Conduct.

Any doubts arising in connection with the construction or application of this Code of Conduct should be brought to the attention of the corresponding hierarchical superior or, where appropriate, the Compliance Officer, and may be also raised through the Whistleblowing and Enquiries Channel.



Compliance with the Code of Conduct shall be understood to be without prejudice to the fulfilment of the remaining rules of corporate governance of the Company and, in particular, the Internal Regulations on Stock Market related matters.

Employees are required to attend the training sessions organised by Atresmedia for the dissemination and familiarisation with this Code of Conduct and the respective obligations that correspond to them within the area of regulatory compliance and crime prevention.

5. Regulatory Compliance Committee (CCN) and Compliance Officer

5.1 Composition and responsibilities of the Regulatory Compliance Committee

Ultimate responsibility for the interpretation and application of this Code of Conduct lies with a collegiate body, the Regulatory Compliance Committee (CCN), whose composition is determined by the Audit and Control Committee. The Regulatory Compliance Committee is currently chaired by the Regulatory Compliance Manager and is composed of senior executives representing the Corporate General Management, the Finance Management, the Regulatory Affairs and Institutional Relations Department, the Internal Audit and Process Control Department and the Legal Affairs Department. The Secretary of the CCN will be a member of the Group's Legal Affairs Department.

As a general rule, the activities of the CCN shall be governed by this Code of Conduct, in connection with the specific matters regulated therein, and by the rules contained in the Internal Regulations on Stock Market related matters. In addition, the CCN may adopt its own regulations.

The Board of Directors supervises the organisation and functioning of the CCN and monitors the implementation of a set of criteria of independence and absence of conflicts of interest applicable to all members of the CCN. The Board may delegate the exercise of these functions to the Audit and Control Committee.

The CCN reports to the Audit and Control Committee of the Board of Directors, which is regularly informed of its activities.

Other managers and employees may attend the CCN meetings at the invitation of the Chair.

The Regulatory Compliance Manager and chairperson of the CCN shall be appointed by the Board of Directors upon recommendation of the Audit and Control Committee and shall have the necessary technical, professional and personal conditions and skills, as well as the adequate qualifications, professional experience and hierarchical independence in the functional organisation of the Atresmedia Group, as required by the legal provisions applicable to the position.

The members of the CCN shall hold their office indefinitely, and the holders of the aforementioned managerial positions and areas may be substituted by resolution of the Audit and Control Committee.

The CCN has the status of a body of the legal entity, with autonomous powers of initiative and control within its sphere of jurisdiction.

The CCN shall have the necessary internal authority, human and material resources, in coordination with the Internal Audit and Process Control Department, to implement and enforce the appropriate internal control measures to detect, prevent, avoid and remedy the commission of criminal, civil, commercial, administrative and tax offences attributable to the legal entity, and to respond appropriately where such offences have occurred as a result of inadequate controls or non-compliance therewith.

The CCN shall be responsible for overseeing the investigation, processing, investigation and proposal of sanctions in connection with any conduct that may constitute a potential criminal, civil, commercial, administrative or tax offence or a violation of the Code of Conduct, in accordance with this Code of Conduct and the Group's disciplinary system.

Without prejudice to the above-mentioned functions and those assigned to the CCN in the Internal Code of Conduct on Stock Market related matters, the CCN shall be exclusively responsible for the following functions:

1. Monitoring compliance with the Code of Conduct, promoting its knowledge and interpreting its rules, as well as resolving any doubts or issues that may arise in this regard.
2. Supervising the activities of the Compliance Officer, the Internal Information Systems Manager and the Data Protection Officer, as well as the appropriate control functions to ensure the independence and freedom of action in the performance of the duties corresponding to these positions.
3. Supervising the activities of the Privacy Committee, the specialised body in this area, which is comprised by the Data Protection Officer, the Compliance Officer and the managers of the areas involved in data processing. The CCN advises on the definition and documentation of procedures and participates in the monitoring of compliance with data protection regulations.
4. Supporting and coordinating the monitoring and supervision of the rules governing the Internal Control System for Financial Information (SCIIF) and Non-Financial Information (SCIINF) with the Finance Department, the Legal Affairs Department and the Internal Audit and Process Control Department.
5. The obligation to report on its activities, on a regular basis, to the Audit and Control Committee and to the Board of Directors.
6. Implementing the appropriate crime prevention control systems, including the description and assessment of the criminal risk map and related controls by business area or unit, the protocol for responding to the commission of potential crimes or breaches of the Code of Conduct, and overseeing the application of the rules of the Internal Information System and the operation of the Whistleblowing and Enquiries channel in accordance therewith.
7. Monitoring the operation of these controls through periodic reviews and the issuance of compliance reports which include those recommendations for improvement that may have been detected.



8. Supervising the Group's disciplinary system and the preparation of training plans on crime prevention and breaches of the Code of Conduct, aimed at Atresmedia employees.
9. Encouraging awareness of the Code of Conduct among Atresmedia employees and third parties affiliated with Atresmedia.
10. Ensuring the effective implementation of decisions taken by the CCN as well as the execution of any penalties or corrective measures deemed appropriate in each case.
11. Preparing reports, on a regular basis, on the level of compliance with Atresmedia's Code of Conduct, and presenting to the Audit and Control Committee and the Board of Directors any recommendations deemed appropriate to improve its contents, facilitate its comprehension, ensure its application and monitor its protection.

Members of the CCN shall maintain confidentiality about the deliberations and decisions of this Committee and shall refrain from disclosing any information, data or reports to which they have access in the exercise of their duties, or from using such information for their own benefit or for the benefit of third parties. These obligations will remain in effect even after their termination or resignation.

The CCN will also take on monitoring and supervisory responsibilities regarding future regulations on any issues or matters related to regulation, regulatory compliance and control.

In carrying out its duties, the CCN may seek the cooperation of other entities, departments, sectors, individuals, or companies within the Group.

The CCN shall coordinate the exercise of any regulatory compliance and control functions by other committees or persons within the organisation to whom such functions have been delegated.

5.2 The Compliance Officer

The position of Compliance Officer shall be held by an independent executive of the Group who shall be appointed by the Board of Directors based on the Audit and Control Committee's recommendation. Alternatively, this position may also be held by the Regulatory Compliance Manager.

The Compliance Officer's responsibilities, which must be reported to the CCN and the Audit and Compliance Committee on a regular basis, are as follows:

- Advising the directors, senior managers and executives of Atresmedia in the taking of decisions that could entail potential criminal consequences.
- The operational coordination of the measures required to implement the Code of Conduct and execute the decisions adopted by the CCN.
- Monitoring and assessing the effectiveness of the rules contained in the Code of Conduct, suggesting possible improvements to the Code when new risks are identified.



- Implementing a crime prevention programme within Atresmedia. The effectiveness of this programme shall be monitored and controlled, and proposals for programme modifications shall be made in response to the identification of new risks. Additionally, in the event that criminal activity is detected, new prevention measures shall be implemented.
- Developing and conducting comprehensive training actions aimed at Atresmedia employees, to enhance their knowledge of the existing regulations and protocols, and to improve and consolidate a strong and pervasive culture of compliance.
- Addressing any concerns, uncertainties or further enquiries raised by those parties affected by the Code.
- Ensuring that communications about the Code originating from collaborators, third parties, etc. are appropriately handled at internal level. This includes providing affected managers with access to the information they need to take the appropriate measures.

In fulfilling his/her duties, the Compliance Officer shall act with autonomy of initiative and control, with a critical perspective, reporting exclusively to the CCN and to the Audit and Control Committee of the Board of Directors.

The Compliance Officer may require support from other areas and individuals within the organisation.

6. Internal Reporting System and System Manager

The Board of Directors of Atresmedia Corporación will establish a comprehensive and rights-respecting internal reporting system, unique to Atresmedia as a whole, and will implement a single communication channel (“Whistleblowing and Enquiries Channel”) that will integrate all reporting channels required by the different regulations applicable to Atresmedia.

The purpose of this channel is to serve as a means for the reporting of any question or complaint relating to Atresmedia or any person associated with the Company that falls within its objective scope of application, in particular with regard to: (i) criminal offences, (ii) breaches of financial or accounting regulations, (iii) instances of discrimination, bullying and sexual harassment, violations of human rights, and (iv) any other behaviour that is contrary to current legislation and to the corporate guidelines and policies outlined in the Compliance Model, which represents the Group's values.

The General Policy of the Internal Reporting System and its implementing rules shall ensure the maximum protection of the rights involved and compliance with the obligations required by applicable law, in particular with regard to: (i) the appropriate handling of confidential information, (ii) the prohibition of retaliation against whistleblowers and any other parties involved in the reporting, (iii) respect for the rights of the alleged violator, and (iv) the effectiveness of the procedures in place for the effective processing of communications.



The position of Head of Internal Reporting shall be held by an independent senior executive, appointed by the Board of Directors, on the recommendation of the Audit and Control Committee. The position may or may not be held by the Compliance Officer.

The Head of Internal Reporting shall have the necessary powers to act with autonomy of initiative and control in the management and investigation of the communications received, reporting exclusively to the Regulatory Compliance Committee (CCN) and, where appropriate, to the Audit and Control Committee. More particularly, the Head of Internal Reporting shall be entrusted with the following functions:

- Supervise and ensure the proper functioning of the Internal Reporting System and the Whistleblowing and Enquiries Channel;
- Establish the criteria and draw up the procedures that guarantee the adequacy and sufficiency of the System for Atresmedia, together with the Whistleblowing and Enquiries Channel included in the System, in accordance with the requirements established in Law 2/2023, of 20 February, which regulates the protection of persons who report regulatory infringements and the fight against corruption;
- Guarantee there will be no reprisals against any person involved in the process;
- Diligently manage the operation of the Whistleblowing and Enquiries Channel and the processing of investigation files;
- Ensure that measures are taken to establish and maintain sufficient guarantees of independence, confidentiality, data protection, and secrecy of communications in the operation of the Channel.
- Ensure that there are no conflicts of interest or, where appropriate, manage them appropriately when dealing with complaints received.

In the event that the System Manager is a collegial body, it shall delegate to one of its members the powers to manage the internal information system and to process information files.

7. Patterns of Behaviour

All employees of Atresmedia are required to act in accordance with the principles of conduct set out below.

7.1. Basic principles of conduct

Compliance with regulations, respect for ethical values and human rights

Atresmedia is committed to conducting its business and professional activities in accordance with applicable regulations. Compliance with the law will always be the starting point for ethical behaviour at Atresmedia.

Atresmedia's activities will be conducted with due respect for human rights and public liberties, in accordance with internationally accepted laws and practices.

Atresmedia is fully committed to respecting, protecting and complying with the United Nations International Bill of Human Rights, as well as the United Nations Guiding Principles on Business and Human Rights and the European Charter of



Human Rights, which enshrines the protection of personal data as a fundamental right.

Since 2008, our company has been a member of the Spanish network of the United Nations Global Compact, demonstrating our commitment to its principles, including the protection and promotion of internationally recognized fundamental human rights.

In accordance with the main national and international instruments for the protection of human rights, Atresmedia has implemented measures to prevent, identify, and eradicate behaviours that may involve the violation of fundamental rights, with particular attention to freedom of expression, personal dignity, the right to honour, privacy and personal image, and the protection of personal data. Respect for these rights is consistent with Atresmedia's values and corporate culture.

Furthermore, Atresmedia provides the necessary means to ensure compliance with the International Labour Organisation's (ILO) regulations, particularly with regard to the elimination of discrimination and the respect of the freedom of association and the right to collective bargaining. Atresmedia will not tolerate any practices that contravene Spanish labour law or the ILO principles and unequivocally condemns child labour and forced labour.

All Atresmedia employees must adopt an ethical approach in all their actions and avoid any conduct that, even if it is not against the law, could damage the reputation of Atresmedia and adversely affect its interests, reputation and public image.

Likewise, all Atresmedia employees must be aware of the laws and regulations applicable to their specific professional activities, request the necessary information from their superiors or from the relevant Atresmedia bodies or units, as appropriate, and strictly comply with the protocols established to detect or prevent the commission of unlawful acts within Atresmedia's activities.

No employee will knowingly collaborate with third parties to violate any laws. Nor will they participate with third parties in any activity that compromises the principle of legality or that could damage Atresmedia's reputation or its perception by the markets, customers, suppliers or regulators, among others.

For its part, Atresmedia undertakes to provide its employees with the necessary means to ensure that they are aware of and understand the legal provisions applicable to their sphere of responsibility and, to this end, the company has established a training plan for its employees on the protocols in force and the legal reforms that are carried out from time to time.

7.2. The Human Team: Relationships with and between employees

7.2.1. Respect among individuals

The Human Resources Policy embodies Atresmedia's human resources management objectives, as well as the Company's values, goals, and strategic principles with respect to providing steady employment and a fulfilling work environment, ensuring human and employment Rights, promoting equality



and diversity, balancing work and family life, and maintaining a safe and healthy work environment.

At Atresmedia, human resources management and employee relations are based on principles of mutual trust and respect, as well as respect for personal dignity and privacy.

Atresmedia undertakes not to disclose employees' personal information without their consent, unless it is legally obliged to do so by court or administrative order. Employees' personal data may not be processed for purposes other than those provided for by law or contract.

Atresmedia prohibits abuse of authority and any form of harassment, including physical, psychological, or moral harassment, as well as any other conduct that may create an intimidating, offensive, or hostile work environment for its employees.

All Atresmedia employees, including managers, are expected to treat each other in a respectful, professional and friendly manner, with the intention of creating a pleasant, rewarding and safe work environment that encourages employees to give of their best. Relationships between Atresmedia employees and the employees of collaborating companies will also be based on the above criteria, as well as on professional respect and mutual cooperation.

7.2.2. Career development, equal opportunities and non-discrimination

Atresmedia is committed to promoting equal opportunities and supporting the professional and personal development of its employees.

In addition, Atresmedia has a zero tolerance policy towards discrimination based on gender, ethnicity, sexual orientation, religious beliefs, political opinions, nationality, social background, disability, or any other factor that could be used as a basis for discrimination.

Atresmedia is committed to supporting and implementing public policies aimed at fostering greater equality of opportunity, promoting a culture of effort and reward for merit, and creating a diverse, fair and inclusive work environment.

Decisions regarding the recruitment and promotion of personnel at Atresmedia must be based on objective and transparent factors and assessments of performance. The procedures and methods used to evaluate professional growth and development at Atresmedia will be duly communicated to employees.

Atresmedia is also committed to providing its employees with opportunities to learn, train and develop their talents, knowledge and skills. This is done to encourage their professional growth and to provide added value to clients, shareholders and Atresmedia as a whole.

Atresmedia recognises the importance of balancing personal and professional life for the overall development of individuals. Consequently, we will encourage measures and implement measures to help our employees achieve this balance.



7.2.3. Teamwork, Collaboration and Dedication

Atresmedia believes that collaboration and teamwork are essential to achieving its goals and making the most of its capabilities, resources, and the diversity of knowledge, skills, and experience that are integrated within Atresmedia..

Therefore, Atresmedia promotes, facilitates, and encourages collaboration and teamwork among the people who make up the Group and between the different companies, units and areas of Atresmedia.

All employees are expected to work together and to share their knowledge, skills and talents in order to best contribute to the achievement of Atresmedia's global objectives and interests.

Atresmedia employees work efficiently, making the best use of the time and resources provided by the company.

To promote loyalty, satisfaction and personal involvement in the overall objectives, Atresmedia is committed to providing resources and developing initiatives and actions that encourage employees to identify themselves with a common project.

7.2.4. Personal health and safety

Atresmedia allocates the necessary resources to ensure that its employees enjoy a suitable, healthy and safe working environment. Likewise, Atresmedia is also committed to improving measures to prevent occupational risks and promote health at work in each sector and location where it operates.

Likewise, Atresmedia also promotes and encourages the adoption of advanced health and safety practices by its suppliers and collaborator companies.

All employees are responsible for ensuring strict compliance with health and safety regulations at work, for their own safety and, more generally, for the safety of anyone who may be affected by their activities. Likewise, employees must make responsible use of the equipment provided to them when carrying out risky activities and must disseminate knowledge and best practices on safety, health and risk prevention among their colleagues and subordinates.

Atresmedia, for its part, is committed to providing employees with the necessary resources and knowledge so that they can carry out their duties safely and in a healthy environment.

7.3. Internal Control and Personal Integrity: Professionalism and independence

7.3.1. Relations with clients

Independence shall be safeguarded at all times, preventing professional actions from being influenced by economic, family or friendship ties with clients. In particular, independence must be guaranteed in the granting and setting of special conditions for credit, financial, purchase or sale transactions or the contracting of goods or services in general, or any other transaction that involves a risk for Atresmedia.



The granting of powers of attorney, proxies or mandates by clients will not be accepted. In cases where such a circumstance is unavoidable, the immediate hierarchical superior or the management of the department concerned, as appropriate, must be informed in advance.

Behaviour such as preferential treatment or personal indebtedness to clients must be avoided.

Atresmedia shall promote and disseminate the contents and principles included in this Code of Conduct among its clients, in particular those that explicitly refer to the relationship between Atresmedia and its clients.

7.3.2. Relations with suppliers (production companies, distributors or suppliers of goods and services)

Relations with suppliers shall be developed within a framework of transparent collaboration that enables and facilitates the accomplishment of common goals and the fulfilment of Atresmedia's social responsibility.

The selection and contracting of suppliers must comply with the regulations in force from time to time, as well as the criteria for the approval of suppliers established by Atresmedia, ensuring transparency, equal treatment and the application of objective and weighted criteria, avoiding the use of suppliers or potential suppliers whose personal interests, outside activities, economic interests or relationships are directly or indirectly contrary to, or potentially in conflict with, the interests of Atresmedia.

The purchase of goods or the procurement of services must be made with complete independence of judgement and without any personal, familial or financial ties that could all into question the criteria used for the selection.

Under no circumstances may the decision-making process regarding the selection of suppliers be influenced by recommendations based on personal interest or preferential treatment.

Atresmedia shall promote and disseminate the contents and principles of this Code of Conduct among its suppliers, in particular those that explicitly refer to the relationship between Atresmedia and its suppliers.

7.3.3. Cooperation with regulatory and other official bodies

Relations with public institutions, bodies, and administrations should be guided by institutional respect and fostered through maximum cooperation and compliance with the law and its decisions. All communications, requirements, or requests for information should be dealt with promptly and efficiently, within the specified deadlines.

7.3.4. Personal and equity-related conflicts of interest. Loyalty to the Group

No personal gain or advantage for family members or related companies may arise from internal or external relationships of our employees. Information obtained in the performance of professional duties may not be used for personal gain. This provision shall understood be without prejudice to the provisions of



the Internal Code of Conduct on Stock Market related issues applicable to persons formally involved in the stock exchange market.

The work relationship between Atresmedia and its employees should be founded on loyalty resulting from mutual shared interests. In this regard, Atresmedia recognises and permits its employees to engage in other financial or business endeavours, as long as such activities are legal, comply with internal regulations and do not constitute competition with Atresmedia or create potential conflicts of interest due to their responsibilities as employees of Atresmedia.

A conflict of interest shall be considered to exist in any situation where the personal interest of the employee directly or indirectly collides with the interest of Atresmedia.

It shall be understood that an employee has a personal interest if the matter under consideration affects him or her or a person closely related to him or her. For this purpose, the following shall be deemed to be related persons:

- a) The employee's spouse or any other person involved in a similar marriage-like relationship with the employee.
- b) The ascendants, descendants and siblings of the employee or of the employee's spouse (or of a person involved a similar marriage-like relationship with the employee).
- c) The spouses of the employee's ascendants, descendants and siblings.
- d) Entities in relation to which the employee or any person related to the employee, either personally or through an intermediary, is involved in any of the situations provided for in Article 42 of the Code of Commerce.
- e) Companies or entities in which the Employee or any person related to him/her, either directly or through an intermediary, holds a position of director or manager or from which he/she receives any remuneration whatsoever, provided that, in addition, the Employee exercises, either directly or indirectly, a significant influence over the financial and operating decisions of such companies or entities.

Any remuneration or compensation, whether financial or otherwise, received by employees in their capacity as representatives of Atresmedia companies in other companies or bodies must be made available to Atresmedia.

Prior authorisation is required to enter into any business relationship, direct or indirect, with Atresmedia or any of its companies, other than as a client, even if such relationships are the result of auctions or public tenders.

The direct or indirect acquisition of transferable securities or financial instruments forming part of the assets of Atresmedia or any of its companies must always be expressly authorised and, where applicable, be subject to the provisions of the Internal Code of Conduct on Stock Market related matters. These transactions must be carried out in accordance with investment criteria, avoiding speculative trading. Atresmedia must be notified in advance of the sale



of securities or financial instruments belonging to employees and members of their families up to the first degree.

Situations that may be considered conflicts of interest as defined in the preceding paragraphs, or any other situation that may arise, must be reported to the Compliance Officer as soon as they become known so that they can be properly assessed and, if they involve a senior or middle manager of the Group, must be included in the personal declaration of compliance and conflicts of interest that he/she is required to make every year.

Any conflicts of interest in which the directors may be involved shall be declared and managed in accordance with the provisions of the Corporations Act and, in the case of Atresmedia Corporación, the Regulations of the Board of Directors.

7.3.5. Gifts and compensations

Atresmedia employees may neither give nor accept gifts or presents in the course of their professional activities. Exceptionally, the giving and accepting of gifts and presents shall be permitted, in accordance with the provisions of the Protocol on the Giving and Accepting of Gifts, provided that the following conditions are met:

- a) they are of negligible or symbolic economic value;
- b) they are in the nature of customary business courtesies or entertainment; and
- c) they are not prohibited by law or generally accepted commercial practice.

Atresmedia employees may not offer or grant, or request or accept, directly or through an intermediary, any undue advantage or benefit with the aim of obtaining an advantage for Atresmedia, for themselves or for a third party. In particular, they may neither give nor accept any form of bribe or commission from or through any other third party, such as Spanish or foreign public officials, employees of other companies, political parties, clients, suppliers, contractors and shareholders. Bribery, which is expressly prohibited, includes the direct or indirect offer or promise of any improper advantage, or any means of concealing such an advantage, as well as influence peddling.

In addition, money may not be accepted personally from customers or suppliers, even in the form of a loan or advance, without prejudice to loans or credits granted to Atresmedia employees by financial institutions that are customers or suppliers and that are not involved in the aforementioned activities.

Atresmedia employees may not accept any form of compensation that could influence, or be perceived to influence, their decision-making process.

In case of doubt as to what is acceptable, the offer must be declined or, if necessary, prior consultation must be sought with the immediate hierarchical superior or the relevant department head, as appropriate.

7.3.6. Other activities



The performance of outside activities, whether remunerated or not, which may interfere with the professional activities of Atresmedia, shall be notified prior to their acceptance. The same notification is required for positions that, by reason of their prominence or any other circumstance, may jeopardise the professional independence or the corporate image of Atresmedia.

7.4 Transparency and Confidentiality

The careful and rigorous handling of personal and business data is an essential tool for maintaining a climate of mutual trust, through the appropriate protection and confidentiality of the information available and the constant commitment to provide complete, objective and truthful information to customers, internal and external partners, the market and society as a whole.

The falsification, manipulation or deliberate use of false information constitutes fraud.

7.4.1. Information to clients

Products and services must be presented with sufficient, clear and accurate information to ensure adequate understanding. Transparent and straightforward language should be used in all documents to be consulted by clients.

7.4.2. Information about clients and suppliers of goods or services

Information about clients and suppliers of goods or services

The information about Atresmedia's clients and suppliers will be kept as a strictly confidential matter and may only be disclosed if required by virtue of law or court order.

This reservation also applies to any information of a personal or financial nature that may be provided by clients and suppliers for the purpose of evaluation or assessment or for the execution of any transaction.

In particular, Atresmedia's employees undertake to respect the confidentiality of any sensitive client information that is subject to special protection under copyright or industrial or intellectual property law.

Access to client and supplier data is only permitted for professional purposes and must be safeguarded and handled in such a way as to guarantee their right to privacy and in strict compliance with the provisions of the Data Protection Agency and the applicable general and specific, external and internal regulations on the protection of personal data.

In no case can family, financial or personal ties between clients justify a breach of confidentiality.

The privacy and confidentiality of conversations and transactions with clients and suppliers shall be guaranteed at all times.

7.4.3. Information about Atresmedia

Professional secrecy must be observed with regard to the available information concerning Atresmedia, its companies and the people who form part of them,

regardless of the commercial, economic or strategic nature of such information, except in the case of express authorisation or when so required by law or court order.

The strictest confidentiality shall be applied in the use of all operating procedures, work systems and other internal procedures.

As far as any matters relating to the stock markets are concerned, Atresmedia shall be governed by the provisions of its Internal Regulations on matters relating to the Stock Market.

As a principle of conduct, Atresmedia embraces transparency of information, understood as the commitment to provide the markets and society with reliable information that allows them to form a true and fair view of Atresmedia's operations, strategy and financial, social and environmental performance. Likewise, the Company undertakes to disseminate promptly any information of relevance to investors, using the criteria and channels established by the National Securities Market Commission (CNMV).

Employees must provide information in a truthful, complete and understandable manner. Under no circumstances should they knowingly provide false, inaccurate or imprecise information that may mislead the recipient. All of Atresmedia's transactions must be reflected transparently and accurately in its accounting records. In particular, all accounts, transactions and expenses must be accurately reflected in the records.

In general, Atresmedia's employees will refrain from any practice that contravenes the obligation to clearly and accurately reflect transactions in Atresmedia's accounting records and will pay particular attention to the reliability of information entered into Atresmedia's computer systems.

7.4.4. Termination of employment

The duty of confidentiality shall survive the termination of the employment relationship with any of the companies belonging to the Atresmedia Group.

8. Responsibility

The functions entrusted to each employee according to his or her position in the organisation shall be carried out in a thorough and responsible manner. Responsible professional conduct shall take the form of:

8.1. Commitment to the Atresmedia Project

Employees shall contribute effectively to the implementation of the policies and the achievement of the objectives defined by Atresmedia, and shall accept the company's decisions as their own.

8.2. Personal and professional development

Employees will consistently focus on their individual training and development, continuously updating their knowledge and skills in order to adapt to the changes brought about by technological and organisational advances, product



and service innovation and improvement, and the constant evolution of the sector.

8.3. Use and protection of resources

Atresmedia's resources, facilities, assets and installations must be used to achieve the objectives for which they are intended and never for personal purposes. The use of assets and the incurring of expenses on behalf of Atresmedia must adhere to the principles of necessity and proportionality. Reports, documents, supporting material, and other items collected in the course of performing assigned duties must be carefully preserved for the use of Atresmedia and may not be used for personal benefit or for the benefit of third parties outside the corporate interests of Atresmedia. Misappropriation and improper use of these assets will be considered fraud.

Similarly, Atresmedia employees should exercise particular care when dealing with assets protected by copyright and industrial property rights in the course of their work. For example, computer applications, manuals, videos, courses, studies, reports, etc. created, developed or improved within Atresmedia may not be used for personal purposes or for the benefit of third parties, or for profit or gain. Atresmedia always retains the intellectual property rights to these assets, unless the information is already in the public domain. In any case, it is imperative to respect the intellectual and industrial property rights of third parties, in accordance with Spanish and international legislation on intellectual and industrial property, or as a result of licensing agreements.

All Atresmedia employees must abide by the current legislation on data protection and may only collect and use those data that are strictly necessary for the efficient management of Atresmedia's activities. This obligation includes the appropriate use of corporate resources related to information and communication technologies made available to employees in accordance with Atresmedia's Security Standards Manual, which outlines the responsibilities and obligations of employees regarding the appropriate use of Atresmedia's equipment and systems.

Atresmedia is committed to providing its employees with the information, expertise and tools necessary to comply with the provisions contained in the data protection and information management regulations applicable to their various spheres of activity.

Any breach of the data protection provisions set out in this section should be reported to the Data Protection Officer (DPO). The DPO will then determine, on a case-by-case basis, the necessary course of action to prevent any possibility of recurrence.

8.4. Classified and confidential information

Without prejudice to the provisions laid down in the Internal Code of Conduct on Stock Market related Matters regarding the treatment of information, Atresmedia's employees undertake to preserve the confidentiality of the information to which they have access in the performance of their professional duties and to use it discreetly, in accordance with the relevant internal regulations



in that respect. Confidential information shall be understood to mean any non-public information developed by or for Atresmedia, the disclosure of which could endanger or jeopardise the Group's competitive advantage or other financial value. Employees must apply responsible and professional criteria in deciding whether information is confidential to Atresmedia. They should also avoid making comments about Atresmedia's confidential information in places that could compromise confidentiality, and refrain from displaying sensitive information in places where it could be inappropriately accessed.

In case of doubt, and unless specifically instructed otherwise, Atresmedia employees should consider all information obtained in the course of their professional duties as confidential.

Prior to joining Atresmedia, the hierarchical superior must be informed of any rights or interests that an employee or manager may have over any inventions or technologies that may be related to his or her work at Atresmedia..

Furthermore, any employee who joins Atresmedia undertakes not to disclose to Atresmedia any information that could be considered sensitive and that originates from the previous company for which he/she provided services, such as customer or supplier information, confidential information, computer applications, etc., which are neither of interest to Atresmedia nor considered as an additional asset of the candidate.

If an Atresmedia employee or manager leaves Atresmedia for any reason, all rights over the assets and information created or obtained during his or her employment with Atresmedia shall remain the exclusive property of Atresmedia.

The use of the Internet and the Atresmedia Intranet, through Atresmedia's equipment and resources and those of other parties, must be in compliance with the applicable laws and regulations and in accordance with the provisions set forth in Atresmedia's Security Standards Manual and in any third party website visited. Atresmedia's servers may not be used for the unauthorised downloading or use of copyrighted information, unless the necessary licence has been obtained. This prohibition is of a general nature and therefore includes, by way of example, the unauthorised downloading of any unlicensed content protected by copyright (images, videos, printed material, music, software, podcasts, computer applications, etc.). It is not permitted to access the Internet from an Atresmedia server in order to view, download, store, transmit or post illegal, harassing, degrading, offensive, pornographic or inappropriate material.

Likewise, it is also necessary to comply with the guidelines and restrictions established by the Group for the limited and responsible use of artificial intelligence (A.I.) tools, which must not contain confidential, restricted or privileged information or any data of a personal nature.

8.5. Personal Data Protection

Protection of personal data

All Atresmedia employees must comply with applicable data protection legislation and with Atresmedia's policies, protocols and internal procedures in

this area, which define the roles and obligations of employees and the principles that must govern their actions in this area.

8.6. Accuracy and Reliability

All customer data entered into the company's computer files as a result of the development of the activity must be accurate and complete and must also be a true reflection of the data contained in the document used as a source.

No apparent, fictitious or insufficiently verified data may be included in any transaction.

Transactions with clients or suppliers must be genuine. Fictitious or simulated transactions, transactions with intermediaries or any other transactions carried out without the knowledge of the client or supplier, or transactions that tend to conceal or alter the reality or ultimate identity of the clients/suppliers or their transactions, must not be carried out.

8.7. Legality

All applicable laws and regulations, whether internal or statutory, must be complied with at all times. Under no circumstances should the Company engage in illegal activities, even if they may offer business opportunities.

Income derived from illegal activities must not be accepted.

8.8. Prevention of money laundering

Atresmedia's employees must pay particular attention to cases where there may be indications of a lack of integrity on the part of persons or entities with whom Atresmedia has business relationships.

In particular, Atresmedia employees shall pay special attention to cash payments that may be unusual given the nature of the transaction, as well as payments made by bearer cheque or in a currency other than that previously agreed.

They must also be alert to payments made to or by third parties not named in the relevant contracts, as well as payments made to accounts that are not those normally used in relations with a specific entity, company or person, or that generally do not conform to the generally accepted practices within Atresmedia.

Likewise, employees must be alert to payments made to persons, companies, entities or accounts opened in tax havens, as well as payments made to entities whose ultimate partner, owner or beneficiary cannot be identified.

Finally, Atresmedia's employees shall pay particular attention to any extraordinary payments not provided for in the relevant agreements or contracts.

Atresmedia's employees shall report any transaction that may be irregular in accordance with the provisions of this section through the channels and procedures established in this Code of Conduct.

8.9. Free Competition and Market Conduct

All Atresmedia employees are committed to free competition and compliance with the laws in force in the various countries in which they operate, and will avoid



any action that involves the abuse or unlawful restriction of competition. They will also refrain from misleading advertising of Atresmedia's activities.

8.10. Corporate image and reputation

Atresmedia considers public trust and reputation to be among its most valuable assets.

All employees must take the utmost care to protect Atresmedia's image and reputation in all their professional activities, including public appearances. Likewise, they shall ensure that the image and reputation of Atresmedia are respected by clients, suppliers and, in general, by companies with which Atresmedia cooperates.

This obligation also extends to employees' participation in social networks or any other form of public communication, provided that this activity is not carried out in a private capacity and therefore in any way involves or implies a relationship with Atresmedia.

8.11. Respect for the environment

The environmental impact of Atresmedia's activities is very limited. However, since 2010, the company has implemented an environmental policy that reflects its commitment to sustainable development and compliance with current legislation in this regard in all areas of its operations, as part of a precautionary principle.

Atresmedia is committed to carrying out its activities with the greatest respect for the environment and to minimising any negative impact that these activities may have. To this end, the company has an environmental strategy that includes a transition plan to achieve zero net carbon emissions in 2050, as well as a series of actions aimed at increasing the use of renewable energy, reducing the generation of waste and promoting environmental awareness among its employees and society as a whole through the content it produces.

In its relationships with production companies, suppliers or external collaborators, Atresmedia will communicate these principles and promote compliance with any environmental procedures and requirements that may be applicable, providing, where appropriate, the means to ensure adequate compliance.

8.12. Commitment to Society; the Atresmedia Foundation

Atresmedia is committed to corporate social responsibility in line with the United Nations Sustainable Development Goals. Its corporate responsibility initiatives, the corporate volunteering programme and the Atresmedia Foundation are the Group's response to the global social challenges outlined in the Sustainable Development Goals and the 2030 Agenda.

In addition, and in line with its social commitment, Atresmedia evaluates the non-financial aspects of the business projects in which it could participate and the material investments it makes. Atresmedia believes that this analysis gives coherence to its commitment to society and sustainable development.

Atresmedia's commitment to society takes the form of sponsorship, patronage and cooperation, which are channelled through agreements and the allocation of resources to organisations with a social focus, in a manner consistent with Atresmedia's strategy.

In line with this commitment and its values of transparency and integrity, all donations made by Atresmedia must have the necessary internal and, where appropriate, external approvals.

Under no circumstances may donations be made to political parties or their representatives, except in cases expressly provided for by applicable law. Similarly, donations may only be made to organisations that have the appropriate organisational structure to ensure the proper management of the funds and must be faithfully reflected in Atresmedia's accounting records.

Likewise, donations may only be made to organisations that have an appropriate organisational structure to ensure the proper management of the funds and must be faithfully reflected in Atresmedia's accounting records.

Similarly, Atresmedia will, as far as possible, monitor the donations made to ensure that they are properly used.

Atresmedia will encourage and promote the collaboration of its employees with organisations of social interest in the places where it operates, including through corporate volunteering programmes, among others.

The Atresmedia Foundation is the most prominent institutional expression of Atresmedia's commitment to society, offering the possibility of designing and implementing long-term policies and strategies, concentrating economic and human resources, and maintaining stable relations of dialogue and collaboration with other foundations and non-profit organisations, with public and private institutions, with public authorities and administrations at various levels, and with the media. In accordance with its founding spirit, minors and young people are the primary beneficiaries of its work, and Atresmedia is the main source of its economic resources, returning to society part of the profits generated through the effort and dedication of its employees, who are also personally involved in volunteering and social responsibility initiatives.

9. Responsibilities in relation to the Code of Conduct

9.1. Responsibilities shared by all employees.

All Atresmedia employees have the following responsibilities:

- Adhere to the principles and standards described in this Code.
- Comply with the laws, regulations and other rules applicable to their position.
- When in doubt, seek advice and guidance from their immediate supervisor or the Compliance Officer.
- Participate in training activities provided by Atresmedia.
- Report any breach or violation of the rules of conduct set forth in this Code.

- Participate in good faith in the development of controls and internal audits that may be conducted to help identify and correct deficiencies or weaknesses in Atresmedia.

9.2. Additional responsibilities of certain staff members.

Senior executives, managers and all employees with audit or control functions have a number of additional responsibilities:

- They must lead by example in their respective roles. Their conduct must be a model of acting with integrity.
- Ensure that those under their responsibility understand the requirements of the Code and have the resources necessary to comply with them.
- Monitor compliance with the principles of this Code by those whom they supervise and manage.
- Monitor the conduct of third parties who represent Atresmedia to ensure that their behaviour is consistent with that of Atresmedia.
- Support employees who come to them with questions and concerns.
- Report any irregular conduct of which they are aware in accordance with the provisions of this Code of Conduct.
- Ensure that those who report their doubts or concerns do not suffer reprisals.

10. Disciplinary procedure

The CCN is the competent body to investigate and propose the appropriate sanction for any breach of this Code.

Both the investigation and the decision to impose a sanction shall be recorded in writing and shall state the reasons for the sanction, both as to the facts and as to the reasons for the sanction.

An employee may not be sanctioned without first being given a hearing and the opportunity to present all evidence and arguments he/she deems appropriate.

The imposition of sanctions, as well as any additional management measures that may be adopted, shall in all cases comply with the provisions of applicable law, the applicable collective bargaining agreement and, where appropriate, the internal guidelines established by the CCN, which constitute the Group's entire disciplinary system.

Complaints against directors or senior executives of the Company or other Group companies shall be dealt with by the Audit and Control Committee or the Board of Directors.

The sanction should be commensurate with all the circumstances involved, including voluntary whistleblowing or reporting under the procedure provided for in this Code.

The foregoing shall be understood to be without prejudice to any violation of the provisions of applicable law and any civil or criminal liability that may be applicable on a case-by-case basis.



11. Effectiveness of the Code

The Atresmedia Code of Conduct was approved by the Board of Directors in 2011 and has been subject to successive revisions and amendments. This text will enter into force on 26 July 2023, the date of its approval by the Board of Directors, and will remain in force until the Board of Directors itself approves its amendment or repeal.

The Board of Directors shall ensure that the Code is adapted to the regulatory changes that may occur in the future and shall encourage its continuous improvement in order to adapt it to the needs of Atresmedia and to the commitments undertaken by the Group in terms of corporate responsibility, compliance and good governance.

12. Information and Assistance

This Code of Conduct contains the general guidelines that should guide the conduct of Atresmedia and all its employees and other persons included within its subjective scope of application.

Any doubts regarding its interpretation or application, as well as any complaints regarding alleged violations of the Code, must be submitted through the established hierarchical organisational structure or through the Atresmedia Whistleblowing and Enquiries Channel.