

# **CODE OF CONDUCT**

## **SCOPE**

This Code of Conduct applies to all employees of WAM Media GRP ("WAM"), its suppliers, partners, customers, employees and anyone doing business with WAM. This policy also applies when WAM employees, suppliers, partners and customers visit third parties. Finally, it applies to all aspects of work for WAM or with WAM.

## **ETHICS AND COMPLIANCE**

WAM management and staff are committed to conducting the commercial business of the company with the highest standards of respect, integrity, and professional conduct.

WAM hereby wishes to clearly and precisely state its values and the principles underpinning the management of its business and its labour relations.

When we drafted this Code of Conduct, we identified the values and mission that define WAM, and we concluded that the primary and fundamental value is that of respect.

Respect includes treating people with the highest degree of integrity, courtesy and professionalism. We have also established WAM's mission and values as follows: inclusion, transparency, and maintaining the safety and health of its employees. We are committed to fostering a work environment where communication is encouraged and which adopts an open door policy. We put our employees first and we want to work in a positive environment with integrity.

To foster and maintain this environment, each of us is responsible for acting with integrity and for the common good.

## **COMMUNICATION**

When you are faced with difficult choices or difficult situations, we encourage you to talk about them. We are always ready to listen.

We will not tolerate any reprisals against any employee who has reported a violation of the law, of this Code of Conduct or of WAM policies (including the Harassment Policy) so long as such report is made in good faith. For more certainty, reprisals may include layoff, salary reduction, negative consequences on the employee's job responsibilities, intimidation or any other significant

change in the terms and conditions of employment of the concerned employee. Expressing, in good faith, a concern will never lead to such reprisals.

An employee who knowingly makes a false allegation is in violation of this Code of Conduct and is subject to disciplinary measures in accordance with local laws and internal procedures. Moreover, reporting a problem does not relieve an employee of his/her responsibility in a case of misconduct.

## **CONDUCT**

The expected conduct mentioned in this Code cannot cover all possible situations we may encounter at work. We trust that you will exercise good judgment by referring to the values and ethical principles contained in this Code as guidelines for your conduct, and to obtain further information or assistance when needed.

We are committed to maintaining a work environment that promotes respect and which ensures everybody's compliance with this Code of Conduct, that fosters ethical decision-making, dialogue, conversations with our employees about ethics, and that encourages employees to bring their issues and concerns to our attention.

Together, we are all responsible for maintaining WAM's values, for adopting ethical practices and for being the example of the kind of conduct that we expect from others.

We conduct our business in a manner that promotes and maintains trust, reflects our professionalism, takes into account the potential impacts of our actions, and which can withstand public scrutiny. We are responsible for our actions and decisions and we use our assets and resources wisely.

Each of us contributes to creating a creative, dynamic and respectful work environment where everyone can do their work to the best of their abilities. This includes building constructive relationships with our colleagues, our audiences, and our business partners. We treat one another with openness and mutual respect and we value diversity and inclusion. We support each other by doing the right thing and speaking out against questionable behaviour.

We respect human dignity and recognize the intrinsic value of each person. We believe that diversity of culture, of opinion, of age, and of gender enriches our workplace and our content by making them both more interesting and creative.

Respect in the workplace allows us to establish and maintain an environment where we can thrive. This idea is not only based on this Code or our Harassment Policy; it must be considered and nurtured every day.

We all have a responsibility to contribute to a workplace and to relationships where mutual respect, civility and cooperation are the standard. When interpersonal conflicts and disagreements arise, we seek to resolve them in a productive and collaborative manner. In addition, we do not tolerate or ignore comments, conducts, actions or gestures that would reasonably be considered to create an intimidating, humiliating, hostile or offensive work environment.

Moreover, we refer you to the Harassment Policy on this subject

## **MANAGER'S RESPONSIBILITIES**

WAM's managers have the following responsibilities:

- a. Promote a violence-free work environment, including the designing of workplaces that minimize workplace violence;
- b. Ensure that this Code of Conduct and the Harassment Policy are explained to all employees they manage and that they are posted and accessible;
- c. Report any incidents of violence, harassment of any form (in particular, psychological or sexual harassment) and any form of discrimination. For more certainty, everyone must take responsibility in preventing any form of harassment or any situation that could lead to harassment.
- d. Provide support to employees who are affected by workplace violence and resolve the situation to the best of their ability;
- f. Make sure employees are comfortable raising any concerns, even if these concerns are directly related to the managers. When you have questions or made a mistake, you should feel comfortable going to the managers to receive their help and guidance.