

# CODE OF CONDUCT FOR BUSINESS PARTNERS

France Télévisions

*Main principles of the Code of Conduct for Business Partners:*

- *Undertake to respect human rights, health and safety, and environmental protection*
- *Undertake to observe ethical conduct*
- *Undertake to take the necessary measures to prevent conflicts of interest and to report any conflict-of-interest situation to France Télévisions*
- *Undertake to communicate using the France Télévisions whistleblowing system.*

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Travers l'été nous s'attacheront dans  
une démarche et 'accablent' que nos  
désirs les partager avec l'ensemble de  
nos partenaires... Soyons tous présents !  
De ce de votre engagement et nos vœux

Delphine Drouot-Lucas

## INTRODUCTION

In recent years, in its business operations, the France Télévisions group has undertaken to observe an exemplary approach in accordance with public service values and principles.

This commitment was initially reflected in our involvement in the fight against all discrimination based on gender, sexual orientation, gender identity and origin, and in the protection and promotion of diversity.

France Télévisions has held the Diversity Label since 2014 and the Professional Equality Label since 2018.

On 18 October 2016, France Télévisions SA signed the *L'autre Cercle* commitment charter, which aims to bring about advancements in the handling of questions relating to sexual orientation and gender identity within the company, to ensure a respectful and non-discriminatory working environment for homosexual, bisexual and transgender persons.

In 2019, as part of a proactive approach, the France Télévisions group signed the Inclusion Manifesto with more than 100 companies, promoting the employment of disabled persons, in particular by establishing links with assistance and service centres helping disabled persons into work (ESAT) and adapted companies.

That same year, France Télévisions also signed another Charter on the representation of disabled persons and disabilities with other directors of audio-visual firms in France.

The France Télévisions group is also committed to environmental protection, in particular by becoming a founding member of the Ecoprod Collective in 2009 along with several large companies in the audio-visual sector. The purpose of this collective is to train, raise awareness, and provide professionals, of all sizes and in all business lines, with tools and guides to give them the best possible assistance and advice in their eco-responsible approach.

In October 2021, France Télévisions Publicité won a gold medal at the "*Grand Prix de la Good Economie*" in the "encouraging sustainable corporate consumption" category. This prize rewarded FranceTV Publicité's commitment to Sustainability. As an advertising network, it highlights the sustainable approaches of the brands it works with by allowing them to show evidence of their activities.

Finally, the France Télévisions group has adopted a plan for excellence, based on an ethics policy (2017), an anti-bribery code of conduct (2018) and a vigilance plan (2020). This Code of Conduct for Business Partners complements this.

Just as it expects compliance with all these values by all its employees, France Télévisions wishes to share the ethical principles set out in this Code of Conduct with all its business partners.

In addition to the principles set out in this Code of Conduct, for all the subject matters in this Code, France Télévisions expects its business partners to comply with the principles laid down in International Labour Organisation Conventions, the Universal Declaration of Human Rights, the UN Global Compact and the UN Women's Empowerment Principles.

Commitment to an ethical approach is an important criterion in the selection and evaluation of business partners. France Télévisions also expects its business partners to apply these principles throughout their supply chain.

## Definitions

Business Partners: Business partners are suppliers, subcontractors, service providers and companies with which France Télévisions has a business relationship.

Workers: Workers are all persons working on behalf of a business partner under an employment contract, a temporary contract, or intermittently (daily, seasonal) on a full-time or part-time basis.

Employees: Employees are all persons working on behalf of France Télévisions under a fixed-term or permanent employment contract, on a full-time or part-time basis.

### General rules

#### **Child labour:**

France Télévisions will not use child labour and will not tolerate the use of child labour by its business partners. Child labour is defined as "any type of labour carried out by a child under the age of 15, excluding labour carried out as part of vocational training or a training programme".

Business partners must comply with the standards defined by the International Labour Organisation Conventions No. 138 and No. 182, the United Nations Convention of 20 November 1989 and the Texier Law No. 99-478 of 9 June 1999.

#### **Forced labour:**

The use of forced labour, slavery, servitude and human trafficking, as well as the withholding of identity documents and work permits, demands for a deposit and any other coercion of any kind, are strictly prohibited.

Labour to repay a debt to an employer or to a third party, prison labour and involuntary labour whilst in captivity are also prohibited.

#### **Illegal labour:**

Illegal, clandestine, undeclared and concealed labour and bargaining in accordance with French law and international standards (ILO Convention No. 29) are strictly prohibited.

#### **Working conditions, working hours and remuneration:**

Business partners must comply with national laws and regulations in force and with international standards for any matters not covered by local laws.

They must also comply with collective agreements, company agreements and any other applicable agreements.

Business partners must respect the maximum working hours, days off and number of days leave specified. They undertake that workers shall have at least one day off in every 7-day period.

Where stipulated by local law, business partners must respect the fixed minimum wage as well as any increases for overtime. In the absence of any provisions on this matter under local law, business partners must ensure that they pay a salary that is at least equal to the average minimum wage for the sector. Similarly, overtime must at least be paid at the basic rate.

Business partners shall not charge any financial penalties to workers.

### **Discrimination:**

Business partners undertake to treat their workers equally and fairly.

No form of discrimination against an employee as a result of their origin, gender, morals, sexual orientation, gender identity, age, family situation, pregnancy, genetic characteristics, particular vulnerability as a result of their economic situation, whether apparent or known to the perpetrator, or as a result of their actual or alleged membership or non-membership of an ethnic group, nation or race, political opinions, union or mutualist activities, exercise of an elective mandate, religious beliefs, physical appearance, family name, place of residence or bank domiciliation, health, loss of independence, disability or ability to speak a language other than French, will not be tolerated.

Thus, no person may be excluded from a recruitment or appointment procedure or from access to an internship or company training, no employee may be penalised, dismissed or the subject of any discriminatory measure, directly or indirectly, as defined in Article 1 of Law No. 2008-496 of 27 May 2008 comprising various provisions for adaptation to EU law on anti-discrimination, in particular with regard to remuneration, in accordance with Article L. 3221-3, profit-sharing and share allocation measures, training, retraining, assignment, qualification, classification, professional promotion, transfer and contract renewal.

### **Bullying, sexual harassment, sexist behaviour and abuse:**

Business partners undertake to treat workers with respect and dignity.

Any repeated action likely to lead to a deterioration in the victim's working conditions, which may undermine their rights and dignity, affect their physical or mental health or jeopardise their professional development, is therefore strictly prohibited.

Similarly, sexual harassment by repeatedly imposing comments or conduct with a sexual or sexist connotation on a person, which undermines their dignity due to their degrading or humiliating nature or creates an intimidating, hostile or offensive situation, is strictly prohibited. Note that any form of serious pressure, even if it only happens once, exerted by the perpetrator or on behalf of a third party in a real or apparent aim to obtain a sexual act, is considered to be sexual harassment.

Business partners also undertake to combat sexist conduct and shall not condone or practice any form of verbal, psychological or physical abuse.

### **Right to organise and freedom of association:**

In accordance with local laws, business partners recognise and respect the right of workers to freely form and join trade unions, be represented, join works councils and participate in collective bargaining without any penalties, discrimination or harassment. They also undertake not to disadvantage workers holding the position of staff representative.

### **Personal data protection:**

Business partners undertake to carefully comply with applicable legislative and regulatory provisions, legal opinion and case-law on personal data protection and privacy.

Data processing carried out on behalf of France Télévisions, as the Data Controller, must be governed by a GDPR Annex on processing, provided by France Télévisions, in accordance with Article 28 of the GDPR, describing in particular: the personal data concerned, the processing purposes, the type of data processing and the category of data subjects.

In the event that France Télévisions and a business partner are joint data controllers in accordance with Article 26 of the European General Data Protection Regulation, or are each independent data controllers, France Télévisions and the business partner undertake to meet in order to define and manage their respective obligations in a specific agreement.

Business partners undertake to comply with their data protection obligations in accordance with this Code of Conduct, any complementary provisions specified in agreements and the regulations in force. In the event of non-compliance with these obligations, the data controller is entitled to immediately terminate the agreement without compensation.

Business partners undertake to only process data for the sole purpose(s) of the agreement with France Télévisions, in accordance with the documented instructions of the data controller and guaranteeing the confidentiality of any personal data processed in agreements using technical and organisational measures.

Business partners may use a sub-processor to carry out specific processing activities. In this case, they shall inform the data controller in advance, in writing, and shall inform it of any proposed change relating to the addition of new processors or the replacement of the processors originally proposed to perform the personal data processing operations.

The original processor is responsible for ensuring that the sub-processor has the same adequate guarantees relating to the implementation of appropriate technical and organisational measures so that the processing meets the requirements of the European General Data Protection Regulation. If the sub-processor does not fulfil its obligations on data protection, the original processor shall continue to be fully liable towards the data controller for the sub-processor's performance of its obligations.

Personal data may only be transferred outside the EU if, pursuant to Article 45 of the GDPR, the European Commission has identified, by means of a decision, that the recipient third country ensures an adequate level of protection (adequacy decision), or pursuant to Article 46 of the same regulation, the processor undertakes to provide appropriate guarantees as specified in Article 46(2)(c) of the GDPR (standard contractual clauses adopted by the European Commission), and provided that data subjects have enforceable rights and effective legal remedies.



## Rules specific to programmes

Special rules may apply to our partnerships with programme providers, particularly with regard to child labour.

Note that in France, there is an exemption to prohibited child labour if the child works in show business, cinema, radio, television, or sound recordings, as a model, or in a company or association the purpose of which is participating in video game competitions.

Thus, for works involving children or adolescents, programme providers undertake to obtain all necessary authorisations, in particular from those involved in the work, from child protection organisations and from the legal guardians of the children or adolescents participating in the work.

In the event of any accounts by persons under the age of 18 in television broadcasts, programme providers acknowledge that they have read the CSA deliberation of 17 April 2007 on the intervention of minors in television broadcasts and the provisions of the Charter on accounts by minors appended to contracts and undertake to append that Charter to the necessary authorisations mentioned above.

For programmes filmed abroad involving children, programme providers undertake to comply with local law, or with international law if it offers greater protection.

Programme providers undertake to respect human rights, including personal dignity and the presumption of innocence.

There are increased expectations of programme providers regarding the points below as programme providers are true partners of France Télévisions in the deployment of its policy on excellence and diversity.

Programme providers undertake to combat any attack or discrimination against individuals, in particular as a result of their beliefs, gender, origin or lifestyle.

They also undertake to support France Télévisions in its diversity policy, the 5 pillars of which are gender equality, ethnocultural and social diversity, disability and LGBTQIA+ representation. As such, they will ensure that this policy is applied in front of and behind any cameras.

In accordance with Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship of disabled persons, and Article L.111-7 of the French Construction and Housing Code requiring public facilities and workplaces to be accessible by all individuals, in particular disabled persons, regardless of their disability and irrespective of the public or private status of the owner thereof. Programme providers undertake to only use amenities and facilities such as stages that meet the requirements of the aforementioned laws, to produce their programmes.

Similarly, sets must be designed such that they can be used by disabled persons where applicable.

## HEALTH AND SAFETY

### Health, safety and training

Our business partners are expected to provide their workers with a safe and healthy working environment.

Business-related risks must be identified and assessed. Business partners must do their utmost to manage such risks and take the necessary precautionary measures in terms of preventing and protecting against occupational accidents and diseases that could be caused by, associated with, or result from workers' activities, including during the handling of equipment or during business travel.

Business partners must therefore establish procedures and training to detect, avoid and mitigate, as far as possible, any hazard that may pose a risk to the health and safety of employees.

Business partners shall also ensure that their activities do not harm the health or safety of subcontractors, operation stakeholders or neighbouring populations.

Business partners must comply with all applicable local and international laws and regulations on this matter. The same rules apply to any accommodation provided by business partners.

## ENVIRONMENT

### Improvement approach:

Committed to acting responsibly and to ensuring a consistent approach as a company and public service broadcaster, France Télévisions has adopted a social and environmental policy.

In line with the Group's CSR policy, France Télévisions has implemented a responsible procurement policy, incorporating sustainable development objectives in procurement procedures and contracts, reconciling inclusion and social progress, environmental protection and enhancement and economic development.

Business partners must therefore monitor the environmental footprint of any products and services supplied to France Télévisions, in particular through:

- participation in climate change mitigation and adaptation, by reducing their greenhouse gas emissions;
- prevention and sustainable use of resources and waste through principles of the circular economy;
- protection of ecosystems and biodiversity;
- prevention and reduction of pollution by reducing emissions into natural environments (air, water, soil) and other environmental impacts.

As such, business partners will ensure that they give preference to the purchase, use and manufacture of eco-products and labelled and certified products (official eco-labels, self-declared environmental claims, eco-profiles).

They undertake to comply with all local and international laws and regulations on environmental respect and protection and to continually minimise the effects of their business on the environment (energy, water, waste, chemicals, air pollution, climate change, etc.) by setting targets to reduce such effects.

Business partners shall promote environmental responsibility within their companies and encourage the development and use of technologies to minimise all environmental impact throughout their outsourcing and supply chains.

### Climate change

Business partners must actively commit to combat climate change by reducing their greenhouse gas emissions (measuring emissions, reducing relevant items, reducing energy consumption, choosing cleaner or zero-carbon energy).

They shall also ensure that they protect themselves against the consequences of climate change on their business by learning how to adapt.

Partners must have voluntary reduction targets or a desire to be in alignment with the Paris agreements on climate change, in accordance with the terms of the SBT (Science Base Target) trajectory.

### Product traceability:

Business partners must demonstrate full transparency throughout their entire value chain, from the manufacture of a product to its distribution to France Télévisions, and must be able to provide all evidence of a product's traceability.

France Télévisions is authorised to ban any product or method, irrespective of any tacit acceptance of business partners' proposals. Business partners shall continue to be bound by an obligation of result.

### Transport:

Business partners must remain vigilant regarding the impact of transport on both climate (greenhouse gas emissions) and pollution (emissions of particulate matter). Transport includes the company's own travel and transport related to supply needs. Business partners undertake to

- use transport methods that limit the use of fossil fuels
- use vehicles with the lowest emissions necessary and comply with standards in force.
- arrange and optimise transport flows to reduce environmental cost.

### Resource and Waste Management: Respect for the circular economy

Business partners shall make every effort to minimise the use of resources (water and raw materials) and to prevent waste emissions throughout the life cycle of their product or service (from the extraction of materials to end-of-life management). Compliance with the principles of the circular economy, be it eco-design, reuse, or recycle, reduces pressure on resources and waste emissions accordingly, allowing a more sustainable use and reduced environmental impact.

For product packaging, business partners shall give preference to the use of sustainable materials and packaging that can be reused (return packaging system), recycled and/or that is made from recycled materials.

## ETHICS AND ANTI-BRIBERY

**France Télévisions is committed to operating in accordance with a set of values and principles contained in the "France Télévisions Ethics Policy"; these guarantee its exemplary conduct as a public service company.**

**Those principles include, but are not limited to, respect within the company, and in all relationships and with all partners of the company, for the legislative and regulatory basis founding the public service and the commitment by France Télévisions to conduct its business with respect for all people and the environment.**

**When developing its content, France Télévisions shall strictly comply and ensure compliance with principles on ethics, neutrality and pluralism, as well as anti-discrimination and the promotion of diversity as set out in the Channels Charter.**

**France Télévisions warrants that it shall operate in accordance with the applicable procedures, in a constant aim to prevent any conflict of interest and to combat bribery in accordance with Law 2016-1691 of 9 December 2016, and shall comply with the applicable rules on human rights, health and safety and environmental law. To formalise these different commitments, France Télévisions has adopted an anti-bribery code of conduct, a vigilance plan and this code of conduct for business partners.**

### **Bribery, facilitation payments and influence peddling:**

France Télévisions applies a "zero tolerance" policy to bribery and influence peddling.

Business partners undertake to take appropriate measures to prevent, detect and penalise any action relating, directly or indirectly, to bribery or influence peddling in their business.

Business partners also undertake not to make facilitation payments, which are deemed to be acts of bribery.

### **Prevention of conflicts of interest:**

Business partners undertake to take the necessary measures to

- prevent situations creating a conflict of interest,
- manage conflict-of-interest situations during their cooperation with France Télévisions.

Business partners undertake to inform France Télévisions if they hire a former employee of France Télévisions for a position where that employee shall be involved in, participate in or could influence the business relationship between the business partner and France Télévisions.

They must send an email to the Director of Compliance, Ethics and Professional Conduct at the following address: [caroline.pasquet@francetv.fr](mailto:caroline.pasquet@francetv.fr)

### Gifts, invitations and trips:

Note that France Télévisions employees are required to comply with internal procedures on gifts, invitations and trips.

Thus, France Télévisions employees cannot accept gifts with a unit or cumulative value of more than 150 euros over one year from the same partner.

They cannot accept a cash or financial gift or any gift in the form of a service or benefit in kind.

They cannot accept gifts delivered to their home, irrespective of whether the gift is intended for them or for a family member or friend.

Similarly, they shall not solicit a gift or advantage for themselves, or for a family member or friend.

As an exception to the rules above, France Télévisions employees who have participated in a public tender procedure may not accept any gift.

France Télévisions employees can only accept lunch invitations if they are business related, reasonable and are not offered during a tender procedure or decision-making period.

Finally, any invitations to external events, seminars, trips, stays, etc. must be business related.

Business partners are informed that France Télévisions has implemented a platform for reporting gifts and invitations to its employees.

### Commitment by business partners:

When conducting their business, France Télévisions expects its business partners to show exemplary behaviour in terms of integrity.

Business partners undertake to respect the rules set out above and to apply similar rules to their own employees, in particular by adopting an anti-bribery policy.

Business partners also undertake to act in accordance with applicable local, national and international laws, particularly on bribery, influence peddling, conflicts of interest, anti-money laundering and counter-terrorist financing.

## COMPLIANCE WITH THE SUPPLIERS' CODE OF CONDUCT AND MONITORING OF COMPLIANCE

Business partners agree to comply with the principles set out in this Code of Conduct and to assess and manage risks in all areas covered herein. They are encouraged to develop their own binding guidelines and policies to ensure compliance with these standards.

Business partners must also ensure that their own suppliers, service providers and subcontractors comply with the principles set out in this Code of Conduct.

France Télévisions reserves the right to monitor compliance with the principles in this Code of Conduct and to conduct compliance audits at its business partners' premises.

Business partners undertake to

- provide any documents necessary to verify compliance with this code,
- authorise France Télévisions and its agents to access the premises to be audited and to provide any information necessary for the assessment,
- keep adequate records to show evidence of compliance with the Code of Conduct for Business Partners.

In the event of breach, France Télévisions shall send a letter of notice to the relevant business partner, listing the breaches and any corrective actions to be implemented within a specified deadline.

An inspection visit will ensure that any corrective actions have effectively been implemented.

In case of failure to implement the commitments within the specified time limit, France Télévisions reserves the right to unilaterally terminate the relationship with the business partner at its exclusive fault and, if necessary, to seek compensation for any loss sustained as a result of such breaches.

## WHISTLEBLOWING PLATFORM

For all whistleblowing, in particular in relation to the content of this Code of Conduct for Business Partners, France Télévisions has set up a system to allow any concerns to be reported to the Ethics and Compliance contact person. That system can be accessed by anyone and guarantees that the identity of the whistleblower, the identity of the persons reported and the relevant information shall be kept confidential. The whistleblowing system is available at the following address:

**<https://alertefrancetelevisions.fr>**

Business partners undertake to regularly inform all their workers of the existence of this platform.