

## THE EGMONT CODE OF CONDUCT

In the Egmont Group, we are committed to:

- a standard of excellence in every aspect of our business throughout the World;
- ethical and responsible conduct in all of our operations;
- support, respect and protect the rights of all individuals; and
- respect for the environment.

We expect these same commitments to be shared by the Business Partners<sup>1</sup> with which we work. At a minimum, we require that all Egmont companies and our Business Partners meet the following standards; in case of non-compliance(s), such deviation(s) must be approved by Egmont Corporate Legal and only in the event such deviation(s) is/are clearly for the benefit of the employee in question, or that corrective actions have been taken in order to comply with the Egmont Code of Conduct.

### General Tenet

Egmont companies and their Business Partners shall comply with all applicable laws and regulations, including those pertaining to the manufacture, pricing, sale and distribution of the Egmont products.

All references to “applicable laws and regulations” in this Code of Conduct include local and national codes, rules directives and regulations as well as applicable treaties.

Egmont will carry out audits to monitor that the standards are shared in all Egmont companies. It is the responsibility of the individual Egmont companies to make sure that Business Partners meet the standards in the Egmont Code of Conduct.

In relation to audits the Business Partner shall allow Egmont and/or any of its representatives unrestricted access to its facilities and to all relevant records at all times, whether or not notice is provided in advance.

*<sup>1</sup> In this Code of Conduct “Business Partner” means any supplier, subcontractor and other relevant business partners that do business with the Egmont Group.*

### Child labour

Egmont believes children’s fundamental human rights should be protected. Egmont and its Business Partners shall not use child labour.

All employees must meet the minimum age for employment as specified by applicable laws and regulations or the Egmont minimum requirement of 15 years of age\* whichever is greater.

Where local law allows 14 years of age, Egmont may approve of such employment in writing on an ad-hoc basis, depending on the specific type of work to be performed and the applicable local age for completing compulsory education, if any.

Egmont companies and Business Partners employing young persons who do not fall within the definition of children (<15 years) shall also comply with any laws and regulations applicable to such persons.

*\* However, Egmont accepts that children work in accordance with national legislation implemented pursuant to the EU Council Directive 94/33/EC of June 22nd, 1994, Section 1, Article 1 & 4.*

### **Freedom of Employment**

Egmont companies and their Business Partners shall not use any forced, bonded or involuntary labour.

### **Coercion and Harassment**

Egmont companies and their Business Partners shall treat each employee with dignity and respect, and shall not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse.

### **Non-discrimination**

Egmont companies and their Business Partners shall not discriminate in hiring and employment practises, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability.

### **Freedom of Association**

Egmont companies and their Business Partners shall respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference.

### **Health and Safety**

Egmont companies and their Business Partners shall provide employees with a safe and healthy workplace in accordance with all applicable laws and regulations, to prevent accidents and injury to health, and ensuring at a minimum, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation.

### **Compensation**

Egmont companies and their Business Partners recognize that wages are essential to meeting employees' basic needs. Egmont companies and their Business Partners shall at a minimum comply with all applicable laws and regulations relating to wage and working hours, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation and provide benefits which are mandatory under applicable laws and regulations.

### **Overtime compensation**

In addition to compensation for contractual hours of work, employees shall be compensated for overtime hours at such premium rate as is legally required in the relevant country, if local laws do not provide for overtime pay, at least regular wages shall be paid for overtime work.

### **Housing provided**

Egmont companies and Business Partners providing housing facilities for its employees as part of the employee compensation package shall comply with all applicable laws and regulations regarding safe and healthy housing facilities, including but not limited to fire safety, sanitation, risk protection and electrical, mechanical and structural safety.

Housing as part of the compensation package can never be compulsory – but is a benefit offered to the employee.

Also reasonable sanitary standards, privacy and access to drinking water must be ensured.

## Hours of work

Except in extraordinary business circumstances\*, Egmont companies and their Business Partners shall not require employees to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by local law or, where local law does not limit the hours of work, the regular work week in such country plus 12 hours overtime. In addition, except in extraordinary business circumstances, employees must be entitled to at least one day off in any seven-day period.

*\*Extraordinary business circumstances is defined as production not being part of the regular production or business flow; meaning such circumstances will only happen in a shorter period of time.*

## Protection of the Environment

Egmont companies and their Business Partners shall comply with all applicable environmental laws and regulations.

## Anti-corruption and bribery

Egmont companies and their Business Partners shall comply with all applicable anti-corruption laws and regulations in relation to their business activities, and in particular, they shall not (i) try to gain undue advantage (i.e. an advantage to which they are not entitled) by promising, offering, giving or accepting anything of value, directly or indirectly, to or from any public official, business partner or any other third party or (ii) engage in any other form of corruption, bribery, facilitation payment, embezzlement, blackmail, nepotism or fraud which seeks to unjustly obtain improper advantages or otherwise influence the outcome of its business dealings. Business Partners must ensure that all relevant employees and third parties have knowledge of and comply with applicable anti-corruption laws and regulations.

## Gifts and Entertainment

Egmont companies and their Business Partners shall refrain from offering funding, donations, lavish gifts and extravagant entertainment or hospitality to any employees of, or other counterparts in, the Egmont Group in an attempt to influence business decisions. The Business Partner shall ensure that any and all gifts and entertainment offered to Egmont employees are transparent, modest, infrequent, appropriate and business relevant. Gifts and entertainment can never be offered in return for something, be in the form of cash or cash equivalents or contain entertainment of a sexual or similarly inappropriate nature.

## Publication

Egmont companies and their Business Partners shall take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees, including the prominent posting of a copy of this Code of Conduct, in the local language and in a place readily accessible to employees, at all time.

## Compliance

Upon request from an Egmont company a Business Partner is required to confirm compliance with this Egmont Code of Conduct in writing.

## Subcontracting

Egmont companies and their Business Partners shall not use subcontractors for the manufacture of products unless such subcontractor complies with this Code of Conduct.

*In the event of discrepancies between the English language original of the Egmont Code of Conduct and any translation into any other language, the English language version shall prevail.*