

Code of Ethics and Business Conduct

Edition 2025

Table of Contents

Message from the Group CEO	3
Introduction	4
Compliance Scope & Network	5
Our Values	6
Our Culture & Ethical Principles	7
<i>beRESPECTFUL</i>	8
<i>beLOYAL</i>	9
<i>bePROFESSIONAL</i>	10
<i>beRESPONSIBLE</i>	11
<i>beGREEN</i>	13
<i>beINCLUSIVE</i>	14
Core Principles of our Code of Conduct	15
<i>Accountability</i>	16
<i>Integrity</i>	17
<i>Respect</i>	21
<i>Ethical Alert</i>	24
Contact Us	25

Message from the Group CEO

As one of the leading sports, entertainment and media groups in the world, beIN has a responsibility to lead by example, both on and off the screen. The success of our Group depends as much on our products and content, as on our ability to demonstrate integrity, respect and responsibility in our business practices.

Our Code of Ethics and Business Conduct defines the fundamental principles that guide our decisions, that govern the way we work and how we implement and promote these principles. The Code serves as a foundation for our group policies, procedures and guidelines, all of which provide guidance for expected behaviours. It is our guide to help us to understand key areas of our basic legal and ethical obligations towards clients, shareholders, business partners and towards each other.

Our actions, words and behaviours do matter. When we do what is right and act with integrity, we live our core values. I am proud to be part of a company that has a long history of high ethical standards.

In a world that is becoming increasingly complex, we should all be mindful that our words and actions reflect the right behaviour. Together, we can address the challenges in our sector.

On behalf of the Chairman and all board members of beIN MEDIA GROUP, I would like to thank you for your commitment.

Yousef Al-Obaidly
Group Chief Executive Officer
beIN MEDIA GROUP

Introduction

Our Group is determined not only to be considered a reliable service provider and a major player in the market, but also to be a pioneer for progress and a catalyst for positive change in our increasingly interconnected world.

It is our belief that by broadcasting sports and entertainment content to people and communities all around the globe – from the Middle East and Europe to Asia Pacific and North America – beIN MEDIA GROUP has a responsibility in building the world of tomorrow: a world in which common respect and understanding of differences in culture and background is encouraged and promoted; and where the rich diversity of the constantly changing world that we live in is championed every day, bringing the world closer together.

That is why beIN MEDIA GROUP has been committed since its launch to promoting the values of Innovation, Inspiration, Collaboration, Storytelling and Inclusivity. We believe that these values will build a better world for tomorrow, in which there is more that unites than divides.

This Code of Business Conduct & Ethics (the "Code") is the cornerstone of beIN MEDIA GROUP's Global Compliance Program and should be read with reference to the other compliance policies which together, form such Global Compliance Program. It is designed to guide our actions and behaviour in all business activities. Its principles aim to encourage all beIN MEDIA GROUP associates and stakeholders to act with integrity and to do the right thing in our dealings with our customers, the communities that we serve and towards each other.

Bear in mind that local laws and regulations may dictate legal obligations not addressed by the Code, or require that we apply a higher standard, but never a lower one.

Compliance Scope & Network

In some countries local laws and regulations may be more stringent or detailed than the principles set out in this Code. Where this is the case, the more stringent and/or detailed rules apply. In all situations where the requirements of applicable laws and regulations, of this Code or of any other beIN MEDIA GROUP policy appear incomplete or unclear, associates shall use good judgement and common sense and seek advice, if needed, from their manager or the Local Compliance Officer (“LCO” i.e. the local employee designated as responsible for compliance), the Local Ethics, Compliance and Risk Committee (the “LCRC”) the Group General Counsel, or any other member of the Group Ethics, Compliance & Risk Committee (“GCRC”).

Any suspected violations of this Code or of any other beIN MEDIA GROUP policies, are encouraged to be reported immediately in accordance with the beIN MEDIA GROUP Speak-Up Whistleblowing Policy. Failure to comply with this Code may result in disciplinary action.

A matter, contract, issue, relationship or interaction is of a *Local Nature*, if it is specifically linked to a group subsidiary or a jurisdiction/region. A matter, contract, issue, relationship or interaction is of a *Group Nature*, if it concerns group projects e.g. in the field of M&A, strategy, digital, is not specifically linked to a subsidiary, jurisdiction or region, concerns a region which is not covered by any LCRC, has been referred by the LCRC to the GCRC or is deemed by the GCRC to require its involvement.

At beIN MEDIA GROUP, responsibility is an ethos that applies on both an individual and corporate level. This Code applies to beIN MEDIA GROUP LLC and all its affiliates, including its subsidiaries and its shareholders (the “Group”), as well as all individuals working for or occupying any position or office within beIN MEDIA GROUP, wherever located and whatever their status (“Associates”), and its consultants, contractors, agents and any other persons acting for or on its behalf or otherwise associated with it. In this respect beIN MEDIA GROUP also requires that all third parties associated with it commit to respect its compliance policies or to evidence that they have effectively implemented their own policies aimed at ensuring compliance with laws and regulations, in particular as regards probity and integrity.

Each Associate has not only the responsibility to abide by this Code and all current or future beIN MEDIA GROUP policies, their principles and all applicable laws, codes and regulations in connection with the same and/or applicable to the group, but must also engage in honest and ethical conduct, including avoiding any actual or apparent conflicts of interest between personal affairs and professional duties to beIN MEDIA GROUP, protecting our group’s reputation, property and confidential information, fostering a good working environment, and more generally helping beIN MEDIA GROUP to ensure that its Global Compliance Program is effectively implemented and complied with in all jurisdictions where we operate by participating in training sessions.

Our values

beIN MEDIA GROUPS’s vision is to be the leading global media company showcasing the world’s most inspiring sports, entertainment and original content – delivered in the most innovative ways – to our customers of all cultures & backgrounds around the world. To support the Group’s Vision, beIN has five values that will guide its business across the world going forward:



Inspiration – beIN was created to inspire. We seek to inspire millions of people to pursue their dreams; to play sport, to entertain and be entertained; and to play a positive role in society.



Innovation – our Group is founded on the latest technology, pioneering advancements and original ideas. Through innovation, we thrill customers, we create compelling content and we safeguard the industry.



Collaboration – beIN is a global family. We believe that a strong team creates the very best results. By connecting with each other, beIN connects the world.



Storytelling – at our heart, beIN brings multi-cultural stories to life. We share these diverse stories across the world: bringing Qatar to the world, and the world to Qatar, like no other broadcaster on the planet.



Inclusivity – we transport everyone on the journey together, no matter your background, interests, culture or language. beONE is our way of working, and also our message to the world.

We believe that these values should always be recognized in how an individual, or our people, behave. Coupled with the universal principles at the heart of our identity – accountability, integrity, respect and ethical alert – we can contribute to build a world, in which there is more that unites than divides.

Our Culture and our Ethical Principles

The confidence and loyalty our stakeholders place in our Group means we must conduct all business activities in line with this Code, alongside all applicable policies, laws and regulations. We also have a duty to continually improve our services and strive for excellence in everything we do to build a more sustainable future. Guided by our values – and recognising that our actions and behaviours matter – our culture is built on six ethical principles: [beRESPECTFUL](#), [beLOYAL](#), [bePROFESSIONAL](#), [beRESPONSIBLE](#), [beGREEN](#) and [beINCLUSIVE](#).



beRESPECTFUL

beIN MEDIA GROUP is committed to fostering an environment where all Associates are treated with respect and dignity, recognising that maintaining such a culture directly contributes to the success of our business. Talent will not go unnoticed.

All Associates are expected to adhere to the following standards to support a respectful working environment:

- Treat others with respect at all times
- Promote collaboration and teamwork
- Encourage participation of all employees. There are no bad ideas.
- Report any inappropriate behaviour such as offensive, unwelcome, harassing or discriminatory behaviour
- Stay open-minded and give/receive feedback to support continuous development
- Support employees with specific needs, abilities or circumstances, and
- Respect all cultures and avoid any actions that may not translate well.

beIN MEDIA GROUP is committed to providing equal employment opportunities and fostering a workspace that is free from offensive, harassing or discriminative behaviour. If any Associate has been victimised or affected in this respect, they are encouraged to report the incident in accordance with our Speak-Up Whistleblowing Policy or any specific internal processes available in their jurisdiction.



beLOYAL

All Associates at beIN MEDIA GROUP are expected to maintain professional interactions and to honour their obligation of loyalty to the Group when communicating with others at all times. Employees have a duty of loyalty to the Group, which means acting in good faith, safeguarding the company's interests and respecting the confidentiality of professional information.

All Associates are expected to demonstrate respect and loyalty towards the Group and its employees, and to be respectful in interactions with external stakeholders including customers, partners, suppliers, subscribers.

The relationship between beIN MEDIA GROUP and its Associates is founded on fairness, mutual trust, and respect, ensuring that everyone is treated with dignity. The Group enforces a strict policy prohibiting all forms of discrimination, undue pressure, legal retaliation, or harassment of a moral or sexual nature.

All Associates must remember that, as an employee of beIN MEDIA GROUP, they are constantly representing beIN and should act and appear in a professional manner during working and should not at any time, whether inside or outside of working hours, act in any way that may reflect negatively on beIN MEDIA GROUP.



bePROFESSIONAL

All Associates, are expected to uphold kindness and integrity in every interaction including on social media by striving to:

- Follow the values, ethical principles and policies of the group at all times
- Uphold the company’s reputation by demonstrating professionalism in their words, behaviour and appearance.
- Use language and behaviour that reflects the company’s values and promotes a respectful, inclusive workplace
- Refrain from any comment or behaviour in public that could be perceived as degrading, humiliating or offensive to the Group, its employees, customers, suppliers or partners
- Refrain from consuming or being under the influence of alcohol or drugs during working hours or on company premises, which is strictly forbidden
- To consume alcohol, if any, only responsibly during professional events or dinners. Excessive alcohol consumption should always be avoided, and any inappropriate behaviour may result in disciplinary action

Employees who are in a close personal relationship with a colleague are expected to always maintain a professional demeanour in the workplace. Public displays of affection are not appropriate in a professional setting. Certain personal relationships (whether romantic, as friends or family members) may impact the professional impartiality or affect the proper job execution.

Hence, every Associate must declare to his line manager any such situation of conflict of interest. Such declaration will be treated confidentially and respectfully.

The line manager, in coordination with the LCO, the LCRC, the Group General Counsel or the GCRC, will assess any necessary measures to manage the situation appropriately.

To avoid potential problems of sexual harassment and favouritism, Associates are strongly advised to ensure that close personal relationships do not influence a person’s conduct at work, Any inappropriate conduct resulting from a close personal relationship, failure to comply with this Code, or refusal to cooperate with any necessary changes to working conditions may result in action under the Group’s relevant policies, such as those governing conflicts of interest or internal regulations.

If a conflict of interest is identified, the Group reserves the right to implement reasonable and appropriate changes to working arrangements. Where applicable, such changes will be documented in writing.

EXAMPLE

You are dating someone who works for one of our customers or who is your subordinate. You met in the course of your work. You are scared that this has given rise to all sorts of rumours. Don’t you have the right to a private life?

The Group respects the right to a private life but has a legitimate interest in asking you to declare such a situation of conflict. To avoid any wrongful perception of favouritism, feel free to speak up to your manager or Human Resources department, who will handle the situation in a confidential and respectful manner.

beRESPONSIBLE

Associates have a responsibility to always do what is best to push beIN MEDIA GROUP into the forefront of the public eye, and a responsibility to themselves i.e. to maintain a healthy work environment, a positive mindset, and a balanced approach to every task.

Corporate social responsibility (“CSR”) is a self-regulating business model that helps a company be socially accountable — to itself, its stakeholders, and the public. CSR is about giving back to the community, supporting philanthropic initiatives, and creating positive social impact. At beIN MEDIA GROUP, we view CSR as both a company-wide responsibility and an individual one. Every Associate, whether alone or as part of the Group, is encouraged to keep CSR in mind when making business decisions. Through this commitment, we aim to build a positive brand image, nature talent, and support our employees and stakeholders. This is demonstrated by the various initiatives that we currently have in place:



beINSPIRED is an initiative that seeks to provide a global platform to under-represented sports and talent. beIN believes in the power and responsibility of broadcasters to inspire the next generation of athletes and fans – regardless of gender, race or background – to find new heroes and to participate in sport. beINSPIRED does this by giving a global platform to events and talent that haven’t, historically, been given the exposure they deserve.



beIN ACADEMY is a development programme designed to discover the next generation of sports industry professionals and a unique opportunity to learn about a career in sports broadcasting and media. Ranging from access to beIN’s state-of-the-art studios, to tailored university workshops, beIN ACADEMY is a programme that currently takes place across four of the Group’s OpCos. beIN France provide regular studio tours while Digiturk, in partnership with Bahçeşehir University, run six different media and broadcast-focussed programmes in Türkiye. Similarly, graduates are being hired in APAC to support broadcast operations while in MENA beIN’s strategic partnership with Qatar University has been extended until at least 2028.

beRESPONSIBLE (continued)



In 2024, beIN launched beIN SQUAD: an initiative with a mission to strengthen grassroots football and promote inclusivity through sponsorship of amateur football clubs across France and Türkiye.

In France, beIN has sponsored 50 amateur football teams, including 10 disability teams, 20 women’s teams and 20 men’s teams, engaging 700 registered players for the entire 2024/25 season, and will sponsor 50 new clubs in the 2025/26 season. In March 2025, beIN broadcast its first amateur football match as if it were a professional football match which attracted a peak audience of 286,000.

In Türkiye, beIN SQUAD is also supporting 50 amateur clubs. In 2024 alone, beIN committed over €180,000 to the initiative with over 100 pieces of content on beIN Digiturk’s. There is further ambition to roll out the programme across MENA.

beINVOLVED

An initiative in APAC, beINVOLVED is a volunteering day dedicated to giving back to society, focused on social and environmental projects.

Previously, employees have worked with local charities and organisations on the programme, which has included litter picking and other environmental initiatives. Employees have also taken part in a ‘marine trash’ clean-up day in Singapore.



Launched by beIN SPORTS France and presented by Florian Genton, beUNITED is a broadcast programme dedicated to connecting fans with disabilities with professional football players.

Fans have been given the opportunity to meet with football legends, including Patrick Viera, Frédéric Guilbert and Kevin Gameiro, with the aim to promote the visibility of disability and fan accessibility in football.

beGREEN

beIN MEDIA GROUP is committed to protecting public health by conducting our operations and activities in an environmentally responsible and sustainable manner. We are also committed to complying with all applicable laws and regulations. We recognise that reducing and, where possible, eliminating the environmental impacts of our activities is an important part of our contribution to society.

The guiding principles to achieve overall sustainability are:

- Comply with mandatory requirements and conduct our activities and operate our facilities within applicable environmental laws and regulations
- Conserve energy and other natural resources
- Reduce, reuse, and recycle to reduce waste
- Adopt green procurement practices; and
- Continue to review and monitor the impact of our activities.

All suggestions to maximise sustainability in the workspace are welcome. Associates should speak to their local Communication/ESG department if they have any ideas or proposals to increase our efficiency in being green.

CASE STUDY: Reusable Water Tumblers for All Staff in MENA

In alignment with beIN's corporate social responsibility efforts and contributing to the Qatar National Vision 2030's Environmental Development pillar, all employees in MENA received a reusable beIN-branded water tumbler. This initiative is an important step forward in reducing single-use plastic waste and reducing our environmental impact, while also promoting sustainability in the workplace.



beINCLUSIVE

beIN MEDIA GROUP believes in strength in diversity. Every person has a different perspective and valuable input to offer, whether it concerns solving an issue or contributing to new ideas. A diverse workforce is a strong workforce.

The Group is committed to eliminating discrimination; promoting equality of opportunity and fostering positive relations. We are dedicated to treating all employees with fairness and respect. In line with our Labour Rights Policy – which requires a shared respect for and understanding of cultural diversity – this commitment extends not only to all beIN Associates but also to all third parties and stakeholders. We are committed to, among other things:

- Fair and equal treatment of all Associates
- A workforce free of child or forced labour
- The freedom to exercise legal rights
- Safe and decent working conditions
- Providing access to grievance mechanisms
- Fair and free recruitment; and
- Wages paid in full, directly and on time.

We expect all employees, business partners and suppliers to understand and uphold these commitments. They are contractually required to adhere to these standards and apply them throughout their own supply chains. Further details on our commitments can be found in our [Labour Rights Policy \(available on the Group's website \[www.beinmediagroup.com\]\(http://www.beinmediagroup.com\)\)](#).

No Associate shall be discriminated or treated less favourably based on religion or belief, gender reassignment, race, sex, race, sexual orientation, age, marriage, pregnancy, parenthood, disability or any combination thereof. For the avoidance of doubt, this includes those who do not disclose such information or identify as such but are perceived to be. We have a zero-tolerance approach to discrimination.

Managers must carefully select employees based on their personal and professional qualifications and assess employee performance based on criteria that must include a compliance component, such as integrity and adherence to beIN MEDIA GROUP's Global Compliance Program.

The Core Principles of our Business Conduct

beIN's Compliance Program rests on 4 Principles at the core of the Code of Ethics and Business Conduct:



01 **Accountability**

Respect of all laws and regulations applicable to us is the responsibility of each Associate and more generally of all persons acting for or on behalf of beIN MEDIA GROUP. Therefore, our group expects that each individual fully understands and complies with our internal policies.

Delegation to Associates does not relieve managers of their overall responsibility. Likewise, the overall responsibility of the management does not relieve Associates of their individual responsibilities.

beIN MEDIA GROUP provides all Associates with necessary training to ensure compliance with local laws, delivered in coordination with line managers and HR Departments (including upon recruitment).

All managers are accountable for ensuring effective communication and for identifying potential compliance issues within their areas of responsibility. This includes monitoring and following up on identified issues, providing adequate supervision of their teams, ensuring tasks are appropriately staffed with the necessary skills and resources, and consistently demonstrating through their conduct and tone a strong commitment to ethics, compliance, and our policies.

The board of directors bears overall responsibility for creating a work and business environment that fosters compliance with laws and where there is zero tolerance for a violation of applicable laws and any deviation from our Global Compliance Program. The board of directors is committed to ensuring that a proper level of supervision is maintained throughout beIN MEDIA GROUP considering its activities and risks related thereto.

In this respect, beIN MEDIA GROUP also requires that all third parties associated with it commit to respect its compliance policies or to evidence that they have effectively implemented their own policies aimed at ensuring compliance with laws and regulations, in particular as regards probity and integrity.

EXAMPLE

Your colleague asks you to route free of charge products to third party commercial and technical service providers or to grant discounts to a business partner in violation of approved processes and policies. A first course of action may be to express your concerns directly to your manager.

If you feel your manager has not adequately addressed your concerns or if you are uncomfortable raising the issue with him/her, you can take further steps to resolve this issue by contacting any appropriate manager, your LCO, the LCRC, the Group General Counsel, as applicable, or raise the issue via beIN Media Group's Speak up Whistleblowing Policy.

02 Integrity

Our values promise expertise to our clients which relates to commitment and innovation but, equally importantly, also relates to integrity and trust. We need to protect our integrity by shunning inappropriate business gifts and invitations.

2.1 Fight against Bribery and Corruption

Bribery and corruption gravely distort fair market conditions, constitute a threat to society and are prohibited. Beyond the fact that the fight against bribery and corruption is therefore a legal obligation for beIN MEDIA GROUP, we adopt, as part of our compliance commitment, a zero-tolerance approach to any type of bribery, corruption or related activities from Associates or any third parties acting for us or on our behalf or otherwise associated with us.

We expect our Associates and counterparts to strictly adhere to this approach, which is a prerequisite condition of having any work or business relationship with beIN MEDIA GROUP.

“Bribery and corruption” refer to:

direct or indirect offering, promising, or giving anything of value with the intention of improperly influencing or rewarding the behaviour of someone, whether a private person or a public official, to, notably but not limited thereto, obtain or retain a commercial, contractual, regulatory or personal advantage, or in exchange for such person to abuse his real or alleged influence to obtain any favourable decision from a public body, or soliciting or receiving anything of value in the above conditions,

And all such behaviours are strictly prohibited by beIN MEDIA GROUP.

This prohibition of bribery and corruption applies indifferently to interactions with domestic and foreign public officials as well as to bribery and corruption between private commercial counterparts, and extends to influence peddling, facilitation payments, illegal kickbacks, and any other unlawful payments or similar behaviours aimed at obtaining undue advantages in exchange for benefits, regardless of whether the national laws of a given country prohibit all such conducts.

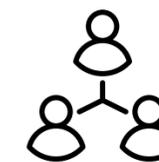
An infringement of anti-bribery and anti-corruption laws and regulations may result in significant fines and other sanctions for beIN MEDIA GROUP and its Associates, including jail sentences, fines and penalties for involved individuals.

Any Associate who participates in any such activities may also be subject to strict disciplinary sanctions, including termination of employment in compliance with applicable laws.

beIN MEDIA GROUP has adopted its [Anti Bribery and Corruption Policy](#) (available on your intranet) that will help you better address situations requiring a particular level of attention, applicable to the following risk areas:



*Interactions with
public officials*



*Interactions with
third parties*



*Gifts & hospitality,
Donations & sponsorship*

02 Integrity (continued)

2.2 Know Your Client & Fight against Money Laundering and Terrorism Financing

Knowing your client is vital to protect beIN from risks related to money laundering/terrorism financing. This principle includes knowing the client's business activities, its sources of funding and income and its owner.

"Money laundering" refers to the process of concealing the illegal origin (e.g., terrorism, bribery, corruption, fraud, etc.) of assets by introducing them into the regular financial cycle.

Associates and all people acting for or on behalf of beIN MEDIA GROUP are strictly prohibited from participating in any business activity that violates applicable laws or regulations regarding the prevention of money laundering and terrorism financing. To this end, beIN MEDIA GROUP provides the relevant Associates with adequate guidance and training regarding identification of at-risk situations and requires them to report any known or suspected events immediately to their manager, the LCO, the LCRC or the Group General Counsel depending on whether the issue is of a Local or Group Nature so that they may determine the appropriate course of action.

Any Associate who participates in any such activities, may also be subject to strict disciplinary action, including termination of employment in compliance with applicable laws. Please refer to beIN MEDIA GROUP's [Anti Money Laundering Policy](#) (available on your intranet).

A proper implementation of our Working With Third Parties Policy is equally important to identify and mitigate the risks associated with money laundering.

beIN MEDIA GROUP will always conduct business only with vetted third parties that are involved in legitimate and lawful business transactions and activities. The "Know-Your-Client" principle demands vigilance and transparency from the start of a business relationship to the end of it.

Considering our group makes extensive use of third parties, we have adopted rigorous and robust control mechanisms aiming to ensure that the third parties we select and with whom we work not only provide the quality and value that best meet defined needs. We are also committed to respecting the values of compliance and integrity that are at the core of our way of doing business. The selection and the monitoring of the activities of third parties are governed by the [Working With Third Parties Policy](#) (available on your intranet), with which every associate should be familiar.

EXAMPLE

A business partner requests you last minute to route a payment to an off-shore account of a company that you do not know rather than to the business partner's local bank account.

You should never agree to wire funds to a bank account other than the one mentioned in the written agreement with the business partner. Unnecessarily complex transaction structures can also hide money laundering activities.

02 Integrity (continued)

2.3 Prevention of Conflicts of Interest

Prevention of conflicts of interest is an essential component of our way of working and constitutes one of the cornerstones of free and fair markets. It is therefore important for beIN MEDIA GROUP that all Associates understand which situations may raise conflicts of interests and know how to avoid and resolve them.

A “conflict of interest” occurs when the personal interests of an Associate interfere in any way with the interests of beIN MEDIA GROUP. A conflict of interest can also arise from personal interests of a family member, a close friend or a business partner of an Associate.

All Associates must declare any situation that may interfere with the interests of beIN MEDIA GROUP with sufficient factual details and it is their responsibility to contact their manager, the LCO, the LCRC, the Group General Counsel or the GCRC depending on whether the matter or issue is of a Local or Group Nature in any situation of potential conflict of interest without delay before accepting to undertake work or to continue to work on the matter/decision.

A conflicted Associate may not be in the relevant matter/decision (whether being present at the decision-making process or by preparing the matter). Notwithstanding the above, on a case-by-case basis, the person to whom the conflict was declared can decide, after analysis, to maintain the relevant Associate on the matter/decision in question, provided that the conflict is deemed not to impact the objective and appropriate handling of the matter / decision.

A proper implementation of the Working With Third Parties Policy and, where applicable, the tendering and auctions policies and/or procedures, is important to identify and mitigate the risks associated with conflicts of interests. These rules apply to Associates at all levels.

Any reported conflict of interest situation must be recorded in a confidential register kept by the LCO of the concerned beIN Media Group entity, subject to local laws, and such register will be reviewed regularly by the applicable LCRC. Please refer to our [Conflict of Interest Policy \(available on your intranet\)](#).

EXAMPLE

You are in charge of selecting sales agents from whom a proposal will be solicited in the context of a product launch in your country. You believe that your niece has exactly the expertise that is required.

You may suggest the name of your niece’s company, after having declared the existence of the conflict of interest but cannot participate in the selection of the bidders.

02 Integrity (continued)

2.4 Compliance with Embargo Laws and Trade Sanctions

Due to beIN Media Group's global presence, it continuously monitors national and international trade laws and regulations to ensure that its business activities comply with such rules and do not infringe any related embargo or international sanctions.

beIN MEDIA GROUP's business transactions may, due to their global nature, be subject to various trade laws and regulations. Furthermore, international (including, unilateral) decisions may restrict or prohibit economic or commercial relations with a particular state or group of individuals or entities.

As a consequence, beIN MEDIA GROUP may face particularly severe sanctions if it fails to comply with such international regulations and decisions, which could even ultimately challenge the future of our business model and the durability of our activities. It is therefore of utmost importance that Associates act in accordance with all applicable laws, rules and regulations relating to embargo laws and trade sanctions. A proper implementation of the Working With Third Parties Policy is important to identify and mitigate the risks associated with embargoes and trade sanctions.

In case of doubt, Associates must contact their manager and request further instruction. If needed, you or your manager must solicit and obtain adequate advice and clearance on the matter from the LCO, the LCRC, the Group General Counsel or the GCRC depending on whether the issue is of a Local or Group Nature to ensure that all transactions are properly evaluated to prevent any potential violations.

2.5 Promoting Fair and Unfettered Competition

beIN Media Group operates in a number of diverse countries in a highly competitive environment and is committed to the principle of unrestricted markets and fair competition. Understanding and working in compliance with anti-trust laws and regulations enables us to compete effectively and fairly on a level playing field and to foster value and continuation of our business.

Many countries where beIN MEDIA GROUP is operating have adopted laws and regulations aimed at preventing adverse effects of anti-competitive practices on their economies and populations. As one of the leading sports and entertainment media groups in the world, beIN MEDIA GROUP must assess in detail its market behaviour to avoid at-risk situations.

Likewise, all Associates must deal fairly with our customers, suppliers, and other third parties and conduct our business with integrity and honesty. Infringement of anti-trust laws and regulations may lead to extremely high fines as well as other sanctions and adverse consequences, including significant reputational damage. It is the responsibility of each concerned Associate to know all applicable anti-trust laws and regulations and comply with them, together with all internal rules that may be adopted by beIN MEDIA GROUP from time to time in this respect.

03 Respect

3.1 Fundamental Rights

As a major sports and entertainment content creator and distributor worldwide, it is essential for beIN MEDIA GROUP to protect fundamental rights of its Associates and to create a safe, fair and equal work environment for all of them. All Associates will be treated and are expected to treat others with dignity and respect.

beIN MEDIA GROUP prohibits taking action that will result in the exploitation of others. As part of its commitment to foster human rights, beIN MEDIA GROUP commits to respect internationally recognized Human Rights' standards and in particular the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the Fundamental Conventions of the International Labour Organization. beIN Media Group's [Labour Rights Policy](#) (available on the Group's website www.beinmediagroup.com) therefore provides that beIN:

- Does not tolerate any harassment or discrimination in any form. beIN MEDIA GROUP is committed to equal treatment of all its Associates irrespective of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation or any other criterion determined by local laws or regulations.
- Prohibits all forms of forced labour and child labour within it and is committed to fair employment practices in compliance with the applicable labour and employment laws and regulations
- Recognizes that the health, safety and wellbeing of its Associates is an integral and essential part of all its business activities. It is the responsibility and duty of each and every Associate to comply with health and safety measures and to follow all relevant laws, rules, regulations, and work instructions.

EXAMPLE

If you are aware of a case of potential human rights violation, a first course of action may be to express your concerns directly to your manager.

If you feel your manager has not adequately addressed your concerns or if you are uncomfortable raising the issue with him/her, you can take further steps to resolve this issue by contacting any appropriate manager, your LCO, the LCRC, the Group General Counsel or the GCRC depending on whether the matter or issue is of a Local or of a Group Nature, or raise the issue via beIN MEDIA GROUP's [Speak up Whistleblowing Policy](#).

03 **Respect** (continued)

3.2 Data Privacy

beIN MEDIA GROUP is committed to complying with all applicable privacy and data protection laws and regulations in all countries where we do business.

“Personal data” is commonly defined as information that can be used on its own or with other information to identify, contact, or locate an individual. All collection, processing, and use of personal data that could be required for the purpose of our activities will be done in accordance with applicable data privacy and data protection laws and regulations.

Personal data needs to be kept accurate and up-to date to properly service our clients and others and should only be kept as long as necessary for the purposes for which it is processed, unless some other period is specifically required or permitted under applicable law. Appropriate care needs to be given to security measures to prevent unauthorised access or misuse and to prevent accidental loss or damage to personal data. Personal data must not be transferred to third parties or abroad without adequate protection or without prior consultation with your legal department.

Associates are responsible for the handling of personal data and information in an appropriate manner and in compliance with applicable privacy and data protection laws and regulations. Various countries have their own laws and regulations about the collection, processing, and use of personal data. If you are unsure about what is permissible, you are required to consult with your manager, your LCO or the Group General Counsel.

Please refer also to our Global Data Privacy Policy (available on the Group’s website www.beinmediagroup.com), which represents the minimum standards that beIN MEDIA GROUP and its affiliates have set with respect to data privacy, for ensuring that we collect, use, retain and disclose personal data in a fair, transparent and secure way.

EXAMPLE

An entity of beIN MEDIA GROUP has developed an update to its apps that would enhance marketing automation features thereof but is unsure whether the previously collected consents cover such enhanced collection of data.

Prior to launching the update, it must be verified whether the resulting collection of data is compliant with the relevant privacy and data protection laws and regulations.

03 **Respect** (continued)

3.3 Access to Information and Confidentiality

Protecting confidential information and beIN MEDIA GROUP's IP is important for our economic success. All Associates are required to maintain and foster strict confidentiality of all relevant information pertaining to our business. beIN MEDIA GROUP will guarantee adequate transparency and sharing of information within the group to allow Associates to properly carry out their duties and missions.

“Confidential information”, as defined by beIN MEDIA GROUP, includes all non-public information, but not limited to information that might be of use to competitors, or harmful to beIN MEDIA GROUP or its customers, if disclosed.

Such Confidential Information entrusted to us is an asset that is as valuable as physical assets. We need to maintain the trust placed in beIN by customers, shareholders, business partners and our employees and protect information related to them and beIN's own business and financial condition.

Such Confidential Information should only be used for the purpose of doing our jobs. Associates will have access to any information required to properly perform their duties and missions. Any information or records legitimately disclosed to the public must be complete and accurate and all transactions, must be recorded in an accurate manner.

All Associates are required to keep all information received as part of their work confidential. Associates are responsible for the protection of any beIN MEDIA GROUP confidential information. No such information shall be disclosed and shared with an unrelated individual (inside or outside beIN MEDIA GROUP) or used for one's own benefit. Please refer to beIN MEDIA GROUP's [Confidentiality Policy](#) (available on your intranet).

EXAMPLE

Your friends often ask you questions about your work: they're curious to know whether or not their favourite tournament will still be broadcast on beIN, and what new launches we have in the pipeline. Of course, you know a lot of the answers because of your job; but what information can you really give them?

Any information (written, electronic, verbal or in any other form) not available to the public and to which you have had access in your capacity as a beIN Associate must be considered internal. Revealing them, even to trusted friends, is not acceptable. It may harm the group's interests.

04 Ethical Alert

All Associates are encouraged to report suspected or actual wrongful conduct in violation of applicable laws or regulations or in violation of the principles set forth in this Code, of which they become aware. This includes, but is not limited to, accounting, finance, anti-trust, corruption and abusive working situations or relationships.

Associates are encouraged to report promptly any suspected violations of laws, rules, regulations or of any policy that is part of beIN MEDIA GROUP's Global Compliance Program, in accordance with the Speak up Whistleblowing policy.

The purpose of the ethical alert system is to protect the company by preventing behaviour that could give rise to criminal liability, while at the same time protecting whistleblowers:

- Prevent the emergence of offences on behalf of the company by alerting the company's decision-makers in the event of non-compliant behaviours or practices,
- Make anonymous reports and be protected against any form of retaliation.

Confidentiality: Ethical alerts and identity of the whistleblowers are shared only with those involved in the investigation and remain confidential.

Protection: Employees or external stakeholders who make an ethical alert or are involved in an investigation should never be punished for sharing their concerns in good faith.

Liability: The Group Compliance team and Internal Audit supervise investigations.

EXAMPLE

Someone told you, in confidence, that one of our suppliers was currently being investigated for corruption. However, during our previous contract negotiations, you found nothing unusual. Should you ignore these rumours?

No. You can't ignore it, and you have to start by asking the supplier for information by providing him with the Third-Party Due Diligence Questionnaire. If you have the slightest doubt, consider raising your concern to the compliance team who will investigate.

For more information, please consult our Speak up Whistleblowing Policy (available on your intranet).

If you are doubtful about a conflict-of-interest situation, if you witness a situation that seems to violate this Code, or you have a doubt about a compliance policy to be applied:

- Your first contact is always your LCO or your local speak up email address, if applicable (e.g. for MENA or Türkiye).
- For the Group, please write to: compliance@bein.com.



This Code of Ethics and Business Conduct has been reviewed and approved by the Board of Directors of beIN Media Group who are all encouraging to have an exemplary culture of integrity in place.

In case of doubt, Associates must contact their manager and request further instruction. If needed, you or your manager must solicit and obtain adequate advice and clearance on the matter from the LCO, the LCRC, the Group General Counsel or the GCRC depending on whether the issue is of a Local or Group Nature to ensure that all transactions are properly evaluated to prevent any potential violations.

The Stakeholders are invited to reach the Group Compliance team through the email address below.

Contact Us

 The Group Compliance Team

 compliance@bein.com

 www.beinmediagroup.com/ethics-compliance/