



Code of ethics

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1. INTRODUCTION

BRUTAL MEDIA, S.L. (hereinafter "**BRUTAL MEDIA**" or the "**Company**") is an innovative production company focused on the creation and distribution of content, series, and films, as well as non-fiction content such as entertainment formats, documentaries, and series. BRUTAL MEDIA is renowned for its high-quality productions and emotionally driven narratives, as well as its powerful creative developments.

Due to its activity and social commitment, and considering the current environment, BRUTAL MEDIA has decided to draft this Code of Ethics in order to maintain and reaffirm the highest ethical standards in the conduct of its activities (the "**Code of Ethics**" or the "**Code**").

This Code of Ethics summarises the fundamental ethical principles that guide the actions of BRUTAL MEDIA and underpin its activities. Additionally, it provides a description of the behaviours that should be promoted within the organisation, as well as those that should be avoided.

This Code of Ethics operates under the commitments described below, and BRUTAL MEDIA considers it its principal policy, being the highest-level regulatory instrument within its normative structure, and establishing the standards of conduct within the Company.

Considering the relationship between ethical principles and actions that are categorised as crimes in the Penal Code, and recognising that the main barrier to an effective code of ethics is the acceptance of non-compliance, the principle of "zero tolerance" will be established as an applicable standard at all levels. Additionally, this Code of Ethics emphasises the importance of full and mandatory collaboration from all members of the governing body, executives, employees, and collaborators of BRUTAL MEDIA (hereinafter and collectively, the "**Members**") in regulatory compliance.

2. SCOPE OF APPLICATION

This Code of Ethics is valid and applicable at all levels of BRUTAL MEDIA, including the governing body, executive positions, control bodies, employees, collaborators, and other individuals associated in any way with BRUTAL MEDIA's activities, all of whom are obliged to comply with it.

Additionally, this Code of Ethics is also applicable to all subsidiaries wholly owned by BRUTAL MEDIA, whether they are constituted indefinitely or aim to produce a specific audiovisual material. The governing body of each subsidiary will sign a record of adherence

to BRUTAL MEDIA's Compliance documents. Henceforth, all references to the Company will be understood to refer to any of its wholly owned subsidiaries.

This Code will also apply to third parties with whom BRUTAL MEDIA has any form of relationship. This includes, but is not limited to, suppliers, clients, and any other individual or legal entity linked to BRUTAL MEDIA.

With regard to interactions and relationships with other organisations, BRUTAL MEDIA commits to always maintaining the commitments described in this Code.

Territorially, this Code is valid for all relationships, both public and private, that BRUTAL MEDIA establishes anywhere in the world.

2.1. Objective

Through this Code, BRUTAL MEDIA aims to demonstrate its intention and commitment to conduct its activities ethically, with integrity and transparency. This Code is a regulatory instrument for the structure and standards of BRUTAL MEDIA's activities, becoming an essential tool for preventing situations that may violate these principles and any applicable laws.

The effective application of the principles of this Code entails:

1. Familiarising oneself with the rules and regulations that apply to the individual activities performed within BRUTAL MEDIA.
2. Using the Internal Information System to report possible violations or non-compliance, as well as to raise any questions related to this Code or the compliance with applicable regulations.
3. Contributing to internal investigations carried out in the event of potential reports of non-compliance.
4. Participating in training programmes related to ethical and regulatory compliance organised by BRUTAL MEDIA.

3. COMMITMENT OF BRUTAL MEDIA

The commitments outlined below embody the values, principles, and norms that must govern the actions of all Members of BRUTAL MEDIA. This Code is based on the following fundamental principles:

- Responsible Governance
- Honesty and Loyalty

- Transparency
- Social Commitment
- Integrity

With this approach, the Code of Ethics serves as an instrument that facilitates the self-regulation of BRUTAL MEDIA and also demands a proactive attitude from its members concerning their tasks and responsibilities.

3.1. Commitment to the law

BRUTAL MEDIA commits to strictly complying with all applicable laws and regulations. The integrity and reputation of BRUTAL MEDIA depend on its strict adherence to legal norms.

Moreover, BRUTAL MEDIA promotes a strong professional ethic, based on transparency and honesty in fulfilling its legal obligations. The Company safeguards the interests of its clients, ensuring that projects are developed in accordance with the prevailing laws and avoiding conflicts of interest.

3.2. Commitment to respect for individuals

3.2.1. Work environment

The Members of BRUTAL MEDIA will maintain a work environment that fosters the full development of all professionals. Thus, respect for the dignity of individuals, trust, and cordiality must prevail.

BRUTAL MEDIA commits to preventing and sanctioning any manifestation or conduct that could be considered violent or could be characterised as an abuse of authority, harassment, or intimidation.

Every employee and collaborator will receive fair and respectful treatment in all circumstances. No form of abusive, hostile, or offensive behaviour, whether verbal or physical, will be permitted.

3.2.2. Dignity, equality, and prohibition of discriminatory treatment

BRUTAL MEDIA promotes absolute respect for the dignity of all individuals, fully supporting human rights in accordance with the International Declaration of Human Rights and the fundamental principles of the International Labour Organisation Declaration. BRUTAL MEDIA is guided by the principle of treating

all individuals with dignity and courtesy, maintaining a safe and respectful work environment.

BRUTAL MEDIA is committed to equality. Discriminatory treatment based on birth, race, sex, religion, opinion, or any other personal or social condition or circumstance is prohibited among the Members of BRUTAL MEDIA.

Selection and hiring procedures will be primarily based on the merits and abilities of the candidates. Members of the governing body must meet the requirements of suitability and integrity for their position.

3.2.3. Prohibition of harassment

The Members of BRUTAL MEDIA will maintain a work environment that fosters the full development of all professionals. Thus, respect for the dignity of individuals, trust, and cordiality must prevail.

BRUTAL MEDIA commits to preventing and sanctioning any manifestation or conduct that could be considered violent, abusive, harassment, or intimidation.

BRUTAL MEDIA establishes a strict policy categorically prohibiting any behaviour that may lead to harassment, bullying, or sexual abuse in all its possible forms. This includes verbal harassment, physical harassment, intimidation, hostility, requests for sexual favours in the workplace or academic context, as well as any sexual conduct conditioned on aspects such as employment, evaluations, promotions, and advancements.

In this regard, and in compliance with labour regulations, BRUTAL MEDIA has a Protocol for action and prevention against situations of psychological harassment, sexual harassment, gender-based harassment, sexual orientation harassment, gender identity or expression harassment, and any type of violence in the workplace.

If an employee or member of BRUTAL MEDIA perceives or suspects the existence of a harassment case or believes they are a victim of such behaviour, they must report the situation immediately following the procedure established in the protocol referred to in the previous point.

The prohibition of harassment, bullying, or sexual abuse also applies to the relationships of BRUTAL MEDIA Members with third parties.

3.2.4. Prohibition of drug trafficking and consumption

Drug trafficking and consumption are strictly prohibited within the scope of BRUTAL MEDIA's business activities.

3.3. Commitment to confidentiality

The Members of BRUTAL MEDIA are obligated and committed to maintaining secrecy and not disclosing to third parties any know-how or confidential information to which they have access, whether documented or verbal, due to their work at BRUTAL MEDIA.

They are also obligated not to use the know-how or confidential information for their own benefit or that of others for purposes other than those of their work.

BRUTAL MEDIA also commits to respecting the confidential and reserved nature of the personal information provided by employees within the framework of labour relations, as well as preserving its integrity and confidentiality in accordance with current data protection regulations.

Members of BRUTAL MEDIA who, due to their activities, have access to confidential information of BRUTAL MEDIA, its members, collaborators, or clients, must maintain the required confidentiality. BRUTAL MEDIA commits not to disclose personal data of its employees, suppliers, collaborators, clients, or patients, except with the express consent of the interested parties or if the disclosure is covered by current regulations, such as in cases of judicial or administrative requirements. Employees' personal data must not be processed for purposes other than those legally or contractually provided for.

3.4. Prevention of fraudulent and unfair conduct

3.4.1. Client protection

In the marketing of its services, BRUTAL MEDIA will always respect the prevailing legal framework, avoiding at all times making statements that may mislead potential service recipients about their characteristics. Similarly, unclear, unintelligible, and ambiguous information will be avoided.

In the advertising of its services, BRUTAL MEDIA will avoid the risk of associating its services with third-party goods or services, registered trademarks, trade names, or other distinctive signs of a competitor.

3.4.2. Protection of suppliers and creditors

The duty of truthfulness will be respected at all times when BRUTAL MEDIA acts as a client. The use of any falsified means of payment, as well as any type of deception towards suppliers regarding the terms of the business relationship, is strictly prohibited.

Any conduct aimed at concealing assets to prevent or hinder the satisfaction of creditors' rights is strictly prohibited.

3.4.3. Protection of competitors

BRUTAL MEDIA will always respect the current regulations prohibiting unfair competition and will avoid all practices that contravene applicable legislation in this area.

In marketing its services, the Members of BRUTAL MEDIA will always respect current intellectual and industrial property regulations. Any activity that could result in the usurpation of such rights, both moral and economic, from their legitimate owners will be avoided.

3.5. Prevention of corruption

During its activities, BRUTAL MEDIA may interact with public officials, government agencies, administrations, public entities, and/or authorities.

In this regard, the Members of BRUTAL MEDIA must follow certain guidelines to avoid:

- Risks of committing any form of private or business corruption, thereby contributing to ensuring fair competition in the market.
- Improperly influencing public officials or public administrations for the personal or commercial benefit of BRUTAL MEDIA.
- Any gifts, entertainment activities, or hospitality provided to these individuals must conform to the values and principles of BRUTAL MEDIA, always within legal limits, transparent and consistent with the activity, and acting at all times in accordance with anti-corruption regulations.

- BRUTAL MEDIA will not receive donations from public funds nor make donations to political parties. All contracts entered into on behalf of BRUTAL MEDIA must be technically and economically substantiated.
- Any suspicion of corruption must be reported through the Internal Information System.

3.6. Gifts, invitations, and other free courtesies

BRUTAL MEDIA limits the giving and receiving of gifts, invitations, and free courtesies and prohibits those aimed at bribery or intended to influence the recipient to make decisions that compromise their impartiality and good judgment.

Under no circumstances is the giving of gifts, benefits, personal advantages, or financial compensations to public officials and employees, whether national or foreign, political party leaders, public office holders, or candidates for such positions, permitted.

3.7. Prevention of money laundering and terrorist Financing

All Members of BRUTAL MEDIA must be vigilant to ensure that clients, patients, suppliers, partners, or investors do not use the Company to engage in money laundering and/or terrorist financing activities.

Any suspicion must be reported through the Internal Information System.

3.8. Prevention of crimes against the Public Treasury, Social Security, and subsidy fraud

BRUTAL MEDIA has established and implemented measures to prevent the commission of crimes against the Public Treasury, Social Security, and subsidy fraud.

3.8.1. Prevention of crimes against the Public Treasury

BRUTAL MEDIA will refrain from carrying out any operation aimed at defrauding the national, regional, provincial, or local Public Treasury; omitting the payment of taxes, withheld amounts, or amounts that should have been withheld; or improperly obtaining refunds or enjoying tax benefits.

3.8.2. Prevention of crimes against Social Security

BRUTAL MEDIA commits to adopting all necessary measures to prevent fraud against Social Security, the avoidance of paying contributions and joint

collection concepts, the improper obtaining of refunds, or the improper enjoyment of deductions for any concept.

3.8.3. Prevention of subsidy fraud

BRUTAL MEDIA will adopt necessary measures to ensure that the information provided for obtaining funds or subsidies is truthful.

Similarly, the concealment of information from the granting entity regarding the requirements necessary to obtain or renew the subsidy, the development of the subsidised activity, and its justification will be avoided.

In the case of subsidies with funds provided before the activity is carried out, BRUTAL MEDIA will establish necessary controls to ensure effective supervision of the subsidised activity. The subsidised activity must always comply with the conditions of the granted subsidy.

4. COMPLIANCE WITH THE CODE OF ETHICS

The Members of BRUTAL MEDIA are obliged to comply with the content of this Code of Ethics. Consequently, BRUTAL MEDIA will periodically verify the effective compliance with this Code of Ethics.

The Members of BRUTAL MEDIA are obligated to report any suspicions they have of violations of the law, this Code, or BRUTAL MEDIA's internal regulations, even if directed by a superior or unaware of the Code. In this regard, BRUTAL MEDIA has implemented an Ethical Channel (or Internal Information System) as a mechanism for submitting reports and communications, both external and internal. This Ethical Channel is accessible to both employees and external persons to BRUTAL MEDIA and allows for reporting possible violations as well as raising questions about the interpretation or application of this Code and other applicable regulations.

The submission of a communication or complaint will lead to the corresponding internal investigation. In case of violations of this Code, applicable legislation, or BRUTAL MEDIA's internal regulations, the Company may apply pertinent sanctions without prejudice to initiating the administrative and/or criminal procedures that may correspond.

Complaints made in bad faith, knowing they are false, or with the purpose of harming a third party will be subject to disciplinary action, without prejudice to any criminal liability that may arise.

5. DISCIPLINARY REGIME

Conduct contrary to the principles contained in the Code of Ethics, as well as in the rest of BRUTAL MEDIA's current internal regulations, will lead to the application of the corresponding disciplinary regime, according to the seriousness of the violation and within the applicable legal framework in accordance with the Workers' Statute and the Collective Agreement that may apply at any given time.

6. REVIEW OF THE CODE OF ETHICS

BRUTAL MEDIA commits to periodically verifying the Code of Ethics to ensure its adequacy to the state of legislation and the organisational structure of the Company. Any modification made will be generally communicated to all persons related to BRUTAL MEDIA.