

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 right of all individuals; and
- respect for the environment.

We expect these same commitments to be shared by the suppliers with which we work in the production of our products. At a minimum, we require that all Egmont companies and all our suppliers meet the following standards; in case of non-compliance(s), such deviation(s) must be approved by Egmont group Human Resource Management 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 suppliers will 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 single Egmont company to make sure that business partners and suppliers meet the standards in the Egmont Code of Conduct.

In relation to audits the supplier/the Egmont company allows 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.

Child labour

Egmont believes children's fundamental human rights should be protected. Egmont and its suppliers will not use child labour.

All employees must meet the minimum age for employment as specified by country and Egmont requirements, whereas the Egmont requirement is 15 years of age*, whichever is greater.

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

** Please refer to the EU Council Directive 94/33/EC of June 22nd, 1994, Section 1, Article 1 & 4.*

Freedom of Employment

Egmont companies and their suppliers will not use any forced, bonded or involuntary labour.

Coercion and Harassment

Egmont companies and their suppliers will treat each employee with dignity and respect, and will 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 suppliers will 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 suppliers will 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 suppliers will 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 suppliers recognize that wages are essential to meeting employees' basic needs. Egmont companies and their suppliers will, at a minimum comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation and provide legally mandated benefits.

If applicable

Housing provided:

Egmont companies and suppliers 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 cleanliness, privacy and access to drinking water must be ensured.

Overtime compensation

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

Hours of work

Except in extraordinary business circumstances*, Egmont companies and suppliers will 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 will 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 suppliers will comply with all applicable environmental laws and regulations.

Subcontracting

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

Publication

Egmont companies and their suppliers will 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.
