

Whistleblowing Policy (EU)

EU Employees, Business Partners and Stakeholders
Updated November 2023

Does this policy apply to me?



Yes, if you are:

An EU employee,
business partner or
stakeholder



No, if you are:

A non-EU employee, business partner or
stakeholder

Overview

Warner Bros. Discovery, Inc. (which includes all of its subsidiaries and affiliates) is committed to the highest standards of integrity, honesty, transparency and accountability.

We all have a responsibility to report unlawful conduct (harassment, discrimination, bribery, fraud, theft etc.), financial malpractice, safety issues, dangers to the environment, or potential breaches of our Code of Ethics, policies, standards or applicable laws.

If you become aware of such behaviour or malpractice, we encourage you to speak up and promptly report the matter so that timely action can be taken, in accordance with this Policy.

Policy Objectives

Warner Bros. Discovery has established this Policy for its EU-based staff, stakeholders and business partners to enable them to report any concerns they may have, and to enable Warner Bros. Discovery to take appropriate action to address those concerns.

Who Can Report Under This Policy?

Any person who has a professional relationship with Warner Bros. Discovery, whether this relation is in progress, terminated or has not yet started, can make a report, including:

- Employees, former employees or prospective employees (including part-time, fixed term interim, interns, job applicants, volunteers etc.);
- Shareholders and persons belonging to the administrative, management or a supervisory body of an undertaking, including non-executive members;
- Warner Bros. Discovery business partners (consultants, contractors, freelancers, agents, agency workers, shareholders, board members, distributors etc.); and
- Any persons working under the supervision and direction of Warner Bros. Discovery contractors, subcontractors and suppliers.

A “**Reporter**” means a person who makes a report in accordance with this Policy.

This Policy does not form part of any employee's contract of employment, and it may be amended at any time.

What Can You Report?

You can report any concerns of suspected misconduct, breach or violation involving Warner Bros. Discovery, relating to:

- local laws or regulations in the countries where Warner Bros. Discovery has a presence or is doing business;
- wrongdoing and dangers in relation to Warner Bros. Discovery's activities; and
- Warner Bros. Discovery's Code of Ethics, Business Partner Statement of Ethics, other policies, or standards.

This includes, for example:

- bribery, money laundering, fraud, corruption or other criminal activity;
- tax evasion or other financial misconduct;
- health and safety risks;
- damage to the environment;
- violence, threats, bullying, harassment, discrimination, substance abuse;
- abuse of Warner Bros. Discovery's property (including intellectual property and confidential information);
- any hinderance or obstruction to, or attempts to hinder or obstruct, a report,
- any attempts to retaliate or retaliation against a Reporter or person assisting a Reporter or with an investigation; and
- the deliberate concealment of any of the above matters.

Any employee who believes that they may have been personally involved in misconduct or a policy violation is still expected to report such incidents. Self-reporting will be considered when deciding whether or what disciplinary action is appropriate.

We expect all reports to be made in good faith. Malicious reports or reports you know to be false, rumours or reports not concerning Warner Bros. Discovery should not be reported under this Policy.

Concerns about a breach of your own employment contract, employment status, promotions, wages, interpersonal conflicts between you and another worker, etc., are not covered under this Policy. Any such concern should be reported to your usual People &

Culture contact and will be considered under any relevant local policies.

How to Report?

You can make a report through the following channels:

- Your manager. If you are uncomfortable speaking with your manager for any reason, contact another member of management (and it does not have to be someone in your direct line of reporting);
- Your People & Culture partner;
- The Ethics & Compliance Office; and/or
- The Ethics 'Hotline' toll-free or access the Hotline website (wbd.ethicspoint.com). You will find the Hotline contact details at the end of the Policy.

You also may communicate in good faith with a government agency regarding a possible violation of the law.

Can you remain anonymous?

You can make a report anonymously - if local laws permit. However, giving your name is likely to help the Ethics & Compliance Office investigate the issue you have raised, because it enables us to contact you if we have any questions or require further information.

Provide as much information as you can.

Any reports made should include as much detail as possible.

You can make a report, in good faith, even if you don't have all the facts. The Ethics & Compliance Office will look into the information you can provide, attempt to verify it and then take appropriate action.

Important details may include, for example, the names of the people involved in or witnesses to the suspected conduct(s), the dates and times of the suspected conduct(s) (approximate or exact), and where suspected conduct(s) occurred.

In your report you should keep the personal data you are sharing to a minimum. The information provided in the report must be factual, necessary, and directly related to the report's topic.

Warner Bros. Discovery will ensure to only process information that is relevant and necessary to the processing of the report. Reports shall be stored for no longer than is necessary and proportionate in order to comply with applicable local laws.

What Happens When You Make a Report?

These are the steps when a report is made under this Policy:

- You will receive a written acknowledgment of receipt of the report within **seven (7) days** from the date the report was received.
- You will receive feedback within **three (3) months** from the acknowledgment of receipt.
- You may be contacted or asked to attend meetings to provide additional information.

If you raise your report directly to a manager, the manager will confer with and may seek the support and assistance of the Warner Bros. Discovery Ethics & Compliance Office or People & Culture team.

Your report is confidential.

We will endeavour to keep your identity, the reported facts and the identity of the persons covered by the report, confidential.

Your identity will not be disclosed beyond the authorised staff members competent to receive or follow up on reports without your

consent, unless we are required to do so by law or by a judicial authority.

If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), or if we are required to disclose your identity because of a particular legal process or aspect of the investigation, we will wherever possible inform you of this in writing and discuss this with you.

What can you do if you do not receive any feedback?

If you are not happy with the way your report has been handled by your manager or appointed contact, we encourage you to contact the Ethics & Compliance Office directly.

If you do not receive any feedback (or if for some reason you do not want to report internally first), you can raise your report to the relevant regulatory authorities in your country. However, in most cases you should not find it necessary to alert anyone externally and we strongly encourage you to seek advice from the Ethics & Compliance Office before doing so.

What Are the Possible Outcomes of Your Report?

Following a report, the following actions may be taken:

- An internal investigation;
- Disciplinary and/or legal proceedings;
- Other remedial actions; and / or
- The case may be closed without further action.

Reporting with Confidence

Retaliation is prohibited.

Warner Bros. Discovery will seek to protect those who make a whistleblowing report in good faith from retaliation. This includes protecting people who assist a Reporter in making a report, third persons who are connected with the reporting person and who could suffer retaliation in work, persons who are witnesses or otherwise assist in an investigation, and legal entities that the reporting person owns, works for, or is otherwise connected to through work. You must therefore not hinder (or attempt to hinder), threaten, penalise or retaliate against a Reporter in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Prohibited retaliation includes:

- suspension, lay-off, dismissal or equivalent measures;
- demotion or withholding of promotion;
- reduction in wages, change in working hours;
- withholding of training;
- negative performance assessment or employment reference;
- discrimination, disadvantageous or unfair treatment;
- blacklisting in a sector or industry-wide informal or formal agreement; and
- any negative impact on your contractual relationship with Warner Bros. Discovery.

If you believe that you have suffered any retaliation as the result of a disclosure, you should immediately contact the Ethics & Compliance Office or People & Culture.

Will you face a sanction if a report ultimately proves to be mistaken or untrue?

Provided you are acting in good faith, it does not matter if you are mistaken, you will not face any type of sanction (i.e., dismissal, punishment, discrimination in any way, directly or indirectly, etc.), even if the report turns out to be mistaken or untrue.

However, if a report is made maliciously with false information, in bad faith or with a view to personal gain or causing harm to others, such behaviour can have serious consequences for the individual making the report, including (depending on local law), criminal sanctions and/or (for employees) disciplinary measures up to and including dismissal.

Contact Details

For further advice relating to the Policy or if you have concerns relating to a potential breach of the Policy, please contact the Ethics & Compliance Office.

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
People & Culture	By email: employeeconnection@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contacts	See country-specific appendices attached hereto.

BELGIUM APPENDIX

How to report?

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	Maria Keaveney, Talent Leader & People Partner Lead - Regional Production maria.keaveney@wbd.com

If you would like to file a report externally to competent authorities, you are free to do so. The competent authorities are listed exhaustively in the Royal Decree of 11 January 2023.

Official link to the French Version:

<https://www.ejustice.just.fgov.be/eli/arrete/2023/01/22/2023040158/justel>

Official link to the Dutch version:

https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&cn=2023012201&table_name=wet

You may also make a public disclosure of the (suspected) breach, provided that you: (1) made an internal or external report prior to disclosure in accordance with this Policy or specific regulation of the relevant external authority and had reasonable grounds to believe, based on the information from the competent authority, that the investigation was not making sufficient progress; and (2) have reasonable grounds to believe that:

1. The breach may pose an imminent or real danger to the public interest, and;
2. There is a risk of harm if reported to a competent authority or other appropriate body, and;
3. The breach is unlikely to be effectively remedied.

CZECH REPUBLIC APPENDIX

How to report?

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	Karolina Masiak, Director, People & Culture Karolina.Masiak@wbd.com

If you would like to file a report externally to competent authorities, you may submit a report orally or in writing to the Ministry of Justice of the Czech Republic. The Ministry publishes information about this reporting process on its website <https://oznamovatel.justice.cz/>. A written form for making a report is available at <https://oznamovatel.justice.cz/chci-podat-oznameni/>.

DENMARK APPENDIX

How to report?

We encourage you to raise your concern internally through one of the following reporting channels, if we are able to address your concern internally and if you do not fear retaliation. In this way, you give us the chance to handle the matter and help you and/or other persons involved.

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	<p><u>For WBITVP</u> Camilla Molin, People & Culture Partner, Production Nordics camilla.molin@wbd.com</p> <p><u>For All Other Entities</u> Stine Brandbjerg, Business Partner - People & Culture stine.brandbjerg@wbd.com</p>

However, if you would like to file a report externally to competent authorities, you are free to do so. Please find information on the various external reporting options below.

The Danish National Whistleblower Scheme:

www.whistleblower.dk

Other external reporting channels:

www.whistleblower.dk/om-ordningen/andre-ordninger

GERMANY APPENDIX

How to report?

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	<u>For WBITVP</u> Holger Grossman, Senior People Partner holger.grossmann@wbitvp.de <u>For All Other Entities</u> Natalia Balabash, VP, People & Culture natalia.balabash@wbd.com

HUNGARY APPENDIX

How to report?

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	Andrea Foran, Senior P&C Partner andrea.foran@wbd.com

Irrespective of which channel through which you have made the report, Andrea Foran, Senior P&C Partner, will be the responsible person for receiving and examining your report, and determining further action.

Can you remain anonymous?

Please note that we will not be obliged to examine reports made anonymously.

ITALY APPENDIX

What can you report?

You can report any concerns of suspected misconduct, breach or violation involving Warner Bros. Discovery, relating to the violations detailed in the policy and Italian Legislative Decree 231/2001 on the corporate liability for crimes or the Organisational, Management and Control Model adopted pursuant to Italian Legislative Decree 231/2001, as applicable.

How to report?

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	Elena Santambrogio, VP - People & Culture Elena.Santambrogio@wbd.com

You may report to the external channel set up and managed by the Anticorruption Authority (ANAC), **ONLY IF**:

- the internal channel is not active or does not comply with the law;
- you have already made an internal whistleblowing report, but it has not been followed up;
- you have have reasonable grounds to believe that making an internal report would not be effectively followed up, or that making the internal report would expose him to a risk of retaliation; or
- you have have reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

External reporting to the ANAC can be send at the following link:

<https://whistleblowing.anticorruzione.it/#/>

NETHERLANDS APPENDIX

What can you report?

You have the opportunity to consult an advisor in confidence about the (suspected) wrongdoing. This can be done via the appointed country/subsidiary contacts listed below and/or the advisory department of the Dutch Whistleblowers Authority (*Huis voor Klokkeluiders*).

How to report?

The report can be internally made through the following channels (1) verbally, via telephone or other voice messaging systems (such as Zoom, Teams, etc.), (2) via electronic mail or (3) at your request within a reasonable time through a meeting at a location.

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	<p><u>For WBITVP</u> Marjanne Wolters, People & Culture Partner Marjanne.wolters@wbitvp.nl</p> <p><u>For All Other Entities</u> Mintsje Baars, Manager, HR & Legal Affairs Mintsje.Baars@wbd.com</p>

If you would like to file a report externally to competent authorities, you are free to do so. Please find information on the various external reporting options below.

- Netherlands Authority for Consumers & Markets (***Autoriteit Consument en Markt***) – for breaches of consumer law
- The Nederlandsche Bank N.V. (***De Nederlandsche Bank***) and the Dutch Authority for the Financial Markets (***Autoriteit Financiële Markten***) – in case of breaches of financial-economic regulations
- Dutch Data Protection Authority (Dutch DPA) (***Authoriteit Persoonsgegevens***) – for breaches of the General Data Protection Regulation (GDPR)
- Whistleblowers Authority
- Health and Youth Care Inspectorate (***Inspectie Gezondheidszorg en Jeugd***)
- Dutch Healthcare Authority (***Nederlandse Zorgautoriteit***)
- Authority for Nuclear Safety and Radiation Protection (***Autoriteit Nucleaire Veiligheid en Stralingsbescherming***)

ROMANIA APPENDIX

How to report?

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	Karolina Masiak, Director, People & Culture Karolina.Masiak@wbd.com

If you would like to file a report externally to competent authorities, you are free to do so. Please find information on the various external reporting options below.

Online platform: <https://avertizori.integritate.eu/>

E-mail address: avertizari@integritate.eu

Telephone number: 0372.069.869

Can you remain anonymous?

Reports that do not include the name, surname, contact details or signature of the Reporter shall be examined and resolved to the extent that they contain substantiated indications of violations of law.



What are the possible outcomes of your report?

If a case is closed without further action, the decision to terminate the investigation shall be notified to the Reporter, specifying the legal grounds.

SPAIN APPENDIX

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	<u>For WBITVP</u> Rocío Marmol, People Partner rocio.marmol@wbd.com <u>For All Other Entities</u> Javier Roa, Director - People & Culture Javier.Roa@wbd.com

SWEDEN APPENDIX

If you would like to file a report internally, please contact:

Who	Contact means
Ethics & Compliance Office	By email: ethics@wbd.com
Ethics Hotline	Call the Hotline toll-free at +1-800-398-6395 or access the Hotline website (wbd.ethicspoint.com). The Hotline website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law.
Appointed Country / Subsidiary Contact	<u>For WBITVP</u> Camilla Molin, People & Culture Partner, Production Nordics camilla.molin@wbd.com <u>For All Other Entities</u> Jessica Nilsson, Head of P&C Nordic & Streaming EMEA jessica.nilsson@wbd.com