

# DEEZER'S CODE OF ETHICS



# FOREWORD.

Since its IPO in July 2022, Deezer has grown faster than ever, making it even more essential that every employee acts with the utmost professionalism, ethics and integrity.

Deezer operates in a sector where more and more laws and regulations are likely to govern its business activities: environment and sustainability, protection of privacy and personal data, regulation of artificial intelligence, not to mention business ethics, the respect of Deezer's value in terms of diversity and inclusion and the physical and mental protection of employees in the workplace.

The knowledge, understanding and observance of these rules by each and every one of us is necessary not only to protect Deezer, but to inspire the utmost confidence in our users, business partners and shareholders.

This Code of Ethics is designed to remind you of the legal rules to which Deezer is subject, but also to reiterate Deezer's commitment to maintaining the highest level of professional, ethical and legal standards in the conduct of its business affairs.

We firmly believe that responsible business practices are essential for ensuring long-term competitive performance and profitability, and we rely on each and every one of you, irrespective of your position in the company, to promote and comply with this Code of Ethics.



**Florence Lao**  
General Counsel & Board Secretary



**Valérie Bernard**  
Chief Human Resources & Sustainability Officer

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# GENERAL PRINCIPLES

# COMPLIANCE AND ETHICS ARE EVERYONE'S BUSINESS

## A mandatory reference for all employees

This Code of Ethics aims at reminding employees of the Deezer group (hereinafter "Deezer") of the key legal requirements to which Deezer is subject, as well as to provide them with guidance on how to carry out their professional activities in compliance with the law and the highest ethical standards.

This Code of Ethics applies to all Deezer employees, irrespective of their role, position, location, and contractual relationship with Deezer. It will evolve according to the needs and orientations of the company.

All Deezer employees are expected to read, understand and comply with this Code of Ethics. In case of doubt or question, you should contact the Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)) or the Human Resources Department ([hr-ethics@deezer.com](mailto:hr-ethics@deezer.com)).

This Code of Ethics being publicly available on Deezer's Investor Website ([www.deezer-investors.com](http://www.deezer-investors.com)), it also constitutes a reference for external stakeholders such as consultants, providers, distributors, partners, shareholders and users.

## A complete compliance and ethics scheme

This Code of Ethics is Deezer's reference document in matters of ethics and compliance. It replaces and supersedes the former Employee Compliance Manual.

It is supplemented by:

1. Specific policies, designed to expand on certain aspects of the regulations and provide Deezer employees with guidance on how to conduct their business
2. Training (online or in person), designed to put these policies into practice.
3. One Trust, a whistleblowing system enabling Deezer employees to report problematic situations they have witnessed.

This Code of Ethics – as well as its related policies – is a living document that will evolve as Deezer grows. The Legal & Compliance Department is responsible for regularly reviewing and updating the Code of Ethics and its related policies.

## A disciplinary regime

This Code of Ethics and its related policies form an integral part of Deezer's Internal Regulations.

This Code of Ethics is not meant to be exhaustive and cannot cover all aspects of the law. Deezer employees are expected to act, at all times, in accordance with the spirit of this document and exercise judgement and common sense when making business decisions.

Failure to comply with this Code of Ethics or its related policies may result in legal and disciplinary action as provided for in Deezer's Internal Regulations, including termination of employment in the most serious cases.

Such failure may also result in civil and criminal liability for the individuals involved.

# THE THREE GOLDEN RULES

1.

## Comply with the law

Always comply with legal requirements in the conduct of your business. If in doubt, do not put yourself or Deezer at risk and contact the Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)) for advice.

2.

## Lead by example

Read carefully this Code of Ethics and its related policies. Do all the compliance, ethics and diversity and inclusion training offered by Deezer. Promote them and encourage others to do the same.

3.

## Speak up

Do not remain inactive if you notice violations of this Code of Ethics or the law. Speak up and report alerts via dedicated channels.

# CONDUCTING OUR BUSINESS ETHICALLY

# FIGHTING BRIBERY AND CORRUPTION

## Key principle

Deezer has a zero-tolerance policy against all forms of bribery or corruption.

“Bribery” or “corruption” consists in offering or accepting anything of value or any type of personal advantage to a public or private person as an inducement for an action or inaction to secure an improper advantage. It can be either active (the person offering the bribe) or passive (the person accepting the bribe). Both forms of bribery are strictly prohibited.

Bribery and corruption are crimes and sanctions can include prison sentences and large financial penalties. Depending on the circumstances, these penalties can be applied to Deezer, Deezer employees or both.

Deezer employees must never offer, promise or give a bribe to anyone – whether a public official or a commercial partner – and must never solicit or accept a bribe from anyone.

Deezer has implemented a global anti-bribery and corruption compliance program, including:

- An [Anti-Bribery & Corruption Policy](#) which explains the applicable legal rules and provides practical advice on detecting, preventing and combating bribery and corruption
- An [anti-bribery and corruption e-learning program](#), that puts you in a real-life situation with practical, concrete examples of bribery and corruption
- [One Trust](#), a whistleblowing solution for reporting an alert in the event of an act or attempted act of bribery or corruption
- An annual anti-bribery and corruption risk mapping exercise, allowing Deezer's policies and practices to be re-evaluated each year

## Do's & Don'ts

- **Offering or receiving gifts and invitations:** Follow the rules set out in the [Anti-Bribery & Corruption Policy](#) and offer only gifts and invitations that are a simple expression of appreciation and courtesy, and of reasonable value.
- **Dealing with public officials:** Be extremely careful in your relations with public officials, and never offer or accept any gift, invitation or payment to public officials. Never make facilitation payments.
- **Lobbying:** Lobbying is strictly regulated and all lobbying actions carried out by Deezer must be recorded. To notify the Compliance Officer of all contacts you have with public decision-makers, please refer to the [Anti-Bribery & Corruption Policy](#).
- **Using intermediaries:** Any decision to use the services of an intermediary must be justified and documented and be subject to prior approval by the Legal & Compliance Department.
- **Making political donations:** Any direct or indirect contribution to political organizations, parties or personalities is strictly prohibited.
- **Making grants, donations and sponsorships:** No grants, donations or sponsorships may be made without the express approval of the Legal and Compliance Department.

You can report any act of bribery and corruption, attempt to commit bribery and corruption, or attempt to conceal an act of bribery and corruption by following the guidance provided in [Deezer's Reporting Policy](#).

If you have any doubts or questions, please contact our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)).



# PREVENTING CONFLICTS OF INTERESTS

## Key principle

All our business decisions must be made in the best interests of Deezer.

A "conflict of interest" refers to any actual or potential situation of conflict between an employee's personal interests and the interests of Deezer. Although such a situation does not necessarily constitute a violation of the law, it may result in taking decisions that are against Deezer's interests.

Deezer employees must never let their personal interests influence a decision when performing their duties, whether it be in a commercial negotiation, in the choice of a product or a service, or in the recruitment of an employee. Any situation where personal interests might conflict, or appear to conflict, with Deezer's interests must be avoided.

However, there may be situations in which a decision is taken in the best interests of Deezer despite the existence of a conflict of interest. In such cases, it is necessary to take precautions to be on the safe side.

## Do's & Don'ts

- Always act in Deezer's best interests
- Refrain from promoting any personal, financial or family interest that might prevent you from acting in the best interest of Deezer.
- Refrain from being involved, directly or indirectly, in any business decision implying a potential or actual conflict of interests.

If you believe that you are in a conflict of interest situation but feel that the decision you are considering is in Deezer's best interest, follow these steps before making a decision:

- Obtain your manager's approval on the contemplated decision
- Comply with the procedures in place within Deezer (recruitment procedure, purchasing procedure, signature circuit, accounting procedures, etc.), and consult all relevant departments
- Notify the conflict of interests to the Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)) and provide all the useful information regarding the potential or actual conflict of interests

If you have any doubts or questions, please contact our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)).

# PREVENTING FRAUD

## Key principle

Deezer has a zero-tolerance policy against all forms of fraud, whatever form it takes.

Fraud can take many forms, including:

- Theft (the act of dishonestly taking something that belongs to someone else and keeping it)
- Embezzlement (the act of misappropriating company funds for personal use)
- Misappropriation of corporate assets (the act of misappropriating company property for personal use)
- Tax evasion (the act of using illegal methods to reduce the tax owed by the company)
- Document falsification (the act of modifying a document in order deceive a third party)
- Streaming fraud (the act of using artificial means to increase the number of streams of a particular song)

All these forms of fraud are crimes and sanctions can include prison sentences and large financial penalties. Depending on the circumstances, these sanctions can be applied to Deezer, Deezer employees or both.

It is imperative that Deezer employees are particularly vigilant, on the one hand, not to directly or indirectly commit an act of fraud and, on the other hand, not to fall victim to an act of fraud by a third party.

## Do's & Don'ts

- Always follow the procedures in place within Deezer (purchasing procedure, signature circuit, accounting procedures, etc.).
- Be particularly vigilant when receiving an email, a phone or any form of request, even when they seem legitimate. Take the time to respond and double check each time necessary.
- Report any act of fraud, attempt to commit fraud, or attempt to conceal fraud by following the guidance provided in [Deezer's Reporting Policy](#).

If you have any doubts or questions, please contact our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)).

# ENSURING FAIR COMPETITION

## Key principle

Deezer supports and strives for fair competition and is committed to comply with applicable competition laws.

Deezer is convinced that a free and open music streaming market benefits users and providers of music streaming services, and more generally the entire music industry.

Deezer promotes fair competition, by refraining from behavior that could affect competition, and by supporting all actions aimed at increasing competition in the music streaming market.

Deezer employees are required to respect these commitments and must not, under any circumstances, take initiatives whose purpose or effect is to restrict competition.

Deezer employees must be particularly vigilant when:

- In contact with our competitors, whether through trade associations or informal discussions: Deezer employees must not share any confidential information with them
- In their dealings with our partners and suppliers: Deezer employees must treat them with respect and fairness, and must not put an excessive pressure on them when negotiating commercial terms
- In their discussions with big players (app stores, majors, etc.): Deezer must ensure that it is treated with respect and fairness, just like Deezer treats its partners and providers

## Do's & Don'ts

- **Don't collude with competitors:** Don't engage in any discussions with our competitors regarding business performance, pricing, market share or any other matter.
- **Treat our business partners with respect and fairness:** Don't abuse our position on the market to obtain unfair conditions from partners and providers, or to prevent them from working with our competitors.
- **Make sure that Deezer is treated with respect and fairness by big players** (app stores, majors, etc.) and benefits from fair terms.
- **Lobbying:** Be particularly vigilant when joining forces with our competitors to promote common claims, either against players abusing their dominant market position, or against public decision-makers adopting regulations we consider contrary to our interests.
- **Trade associations:** Be particularly vigilant when participating in trade associations and don't exchange confidential information with competitors or other players in the streaming market (majors, labels, publishers, etc.).

If you have any doubts or questions, please contact the Legal & Compliance Department ([compliance@deezer.com](mailto:compliance@deezer.com)).

# PROTECTING PERSONAL DATA

## Key principle

The protection of the privacy and personal data of our users is a key priority for Deezer.

Protecting personal data is not only a legal obligation for Deezer – with the enactment of numerous regulations worldwide, especially in Europe with the adoption of the General Data Protection Regulation ("GDPR") – but also a business necessity with the adoption of an increasing number of market standards (e.g., Transparency & Consent Framework, Payment Card Industry Data Security Standard).

It is of the utmost importance that everyone at Deezer takes all necessary measures to ensure the protection of the personal data for which he/she is responsible.

Not only is non-compliance with the regulations likely to result in the application of very substantial financial penalties for Deezer (up to 4% of its annual turnover), but the repercussions can also include business and reputational damage, user claims, etc.

Deezer has implemented policies and trainings to ensure the protection of personal data, including:

- A [Privacy & Data Protection Policy](#), which explains the applicable legal rules and provides practical advice on how to process and protect personal data
- A [data protection e-learning program](#), that puts you in a real-life situation with practical and concrete examples

## Do's & Don'ts

- **Obtain the user's consent where necessary:** If the processing of personal data is not necessary for the performance of a contract, for compliance with a legal obligation, or for the purpose of Deezer's legitimate interest, then user consent is required (e.g., for personalized advertising and targeting).
- **Don't collect more data than necessary, and always for a specific purpose:** Only data which is strictly necessary to achieve the purpose of the processing must be collected.
- **Don't keep data for longer than necessary:** When data is no longer required, it must be either deleted or anonymized, in accordance with Deezer's retention periods.
- **Protecting the confidentiality and security of personal data:** Ensure that data security measures – whether organizational or technical – remain up-to-date and state-of-the-art.
- **Only share data on a need-to-know basis:** In particular with service providers, only send data that is necessary for the performance of their services and always make sure that our service providers adopt the best security practices and respect applicable privacy regulations.
- **Immediately report any incident** that may affect the confidentiality, integrity and availability of our users' personal data to our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)) and IT Team ([IT-Security-Office@deezer.com](mailto:IT-Security-Office@deezer.com)).

# ENSURING CYBERSECURITY AND CONFIDENTIALITY

## Key principle

Given the constant increase in cyber-attacks, ensuring the cybersecurity of our systems and infrastructures is of the utmost importance to Deezer.

Like the protection of personal data, the protection of our systems and technical infrastructures is a legal and business necessity: a cyber attack that prevents our users from accessing Deezer could jeopardize the company.

Deezer employees play a key role in protecting Deezer's systems and infrastructures. It is essential that employees make a responsible and reasoned use of the computing resources which are made available to them, and that they actively participate in maintaining the confidentiality, availability and integrity of Deezer's systems and infrastructures.

This is all the more important when using artificial intelligence (AI) systems, as their potential vulnerabilities, if exploited, could involve unauthorised access and manipulation of training data. Such manipulation could expose confidential information and compromise Deezer's overall security.

The role of employees in cybersecurity is all the more important with the development of remote working and the use of computing resources on personal devices.

Deezer has implemented policies and trainings to ensure the proper use of computing resources, including:

- An [IT Policy](#), which specifies the applicable rules when accessing and using the computing resources provided by Deezer
- A [cybersecurity e-learning program](#), via Albert.

## Do's & Don'ts

- **Be extra vigilant to potential fraud and phishing attempts:** Always check the identity and email address of the sender and don't open attachments with unusual filename extension.
- **Use strong passwords and never share them with anyone**, whether within Deezer or outside (including IT Corporate). Use multifactor authentication each time available.
- **Regularly backup work information, data and files:** Avoid keeping your work data on the internal storage space of your device, nor on USB or external hard drives. Prioritize storage on Google Drive and shared file servers.
- **Control the dissemination of work information, data and files:** Share information only with those who need to know and only via the sharing applications provided by Deezer. Mark documents as confidential as need be.
- **Never upload and/or feed public AI systems with confidential, sensitive or proprietary documents and/or informations about Deezer.**
- **Comply at all times with Deezer's IT Policy** and complete all cybersecurity training available via Albert.
- **Immediately report any incident** that may affect the confidentiality, integrity and availability of Deezer's systems and infrastructures, to our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)) and IT Team ([IT-Security-Office@deezer.com](mailto:IT-Security-Office@deezer.com)).

# COMPLYING WITH INTERNATIONAL SANCTIONS

## Key principle

Deezer is committed to comply with applicable international trade sanction, including E.U. and U.S. sanctions, to the extent permitted under French law.

Several countries and organizations have issued economic restrictions and trade sanctions against certain countries, organizations and individuals, and Deezer must comply with them.

The lists of countries under embargoes or targeted sanctions are issued by:

- The [French Direction nationale du Trésor](#)
- The [European Union](#)
- The [United Nations](#)
- The [US Office of Foreign Assets Control](#)

Failure to comply with such international trade sanctions is likely to result in the application of very substantial financial penalties and criminal sanctions for Deezer.

Anyone at Deezer must avoid entering into discussions relating to the provision of any Deezer service in a country under embargo or trade sanction.

## Do's & Don'ts

- Don't engage with potential business partners or service providers located in countries under embargoes (please see list of countries in Key principle section).
- Be extra vigilant when engaging with potential business partners or providers likely to be located in countries under targeted sanctions: Always consult the Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)) before starting any discussion.
- Regularly check the lists of sanctions adopted by France, the European Union, the United States and the United Nations.

If you have any doubts or questions, please contact our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)).

# PREVENTING INSIDER TRADING AND STOCK MARKET ABUSE

## Key principle

As a public company listed on the Paris stock exchange, Deezer thrives on transparency and fair market practices.

The key principle of financial market regulation is that everyone should have access to the same information when dealing on the stock exchange.

Insider trading violates this principle as one would deal on the stock exchange based on material, non-public, information ("inside information"):

- Material means the information is specific enough to give its holder an unfair advantage when trading. An information will be considered material if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security, or where the fact is likely to have a significant effect on the market price of the security.
- Non-public means the information is not available to the market.

Using or sharing inside information is illegal. Anyone who fails to comply with insider trading rules is likely to face severe reputational, legal and professional consequences. Under French law, both individuals and companies could face a maximum penalty of EUR 100 million per violation, and up to 5 years imprisonment.

Deezer has implemented an insider trading program, including:

- An [Insider Trading Policy](#) which explains the applicable legal rules and provides practical advice on how to trade safely
- An [insider trading e-learning program](#) that puts you in a real-life situation with practical, concrete guidance on how to trade safely
- An insider list that includes all persons considered as permanent or temporary insiders

## Do's & Don'ts

- Don't trade Deezer shares if you find yourself in possession of commercially sensitive or inside information. If you are unsure as to whether you have inside information, then be overly cautious and avoid trading until you can ask for clarifications.
- Don't trade during black-out periods if you are on an insider list. The purpose of these black out periods is to prevent permanent or temporary insiders from making unfair use of confidential information and trading in Deezer shares.
- Don't disclose any commercially sensitive or inside information to any third party unless the disclosure is made as part your professional duties.
- Don't explicitly or implicitly recommend or incite a third party, based on insider information, to complete a transaction in the Deezer shares.

If you are unsure as to whether a potential decision or action could be a violation of insider trading rules, contact the Legal & Compliance Department ([insider-trading@deezer.com](mailto:insider-trading@deezer.com)).

# ENSURING A SAFE WORKPLACE



# GROWING OUR PEOPLE AND TALENTS

## Key principle

Deezer is committed to creating a work environment that fosters the personal and professional development of its employees and believes that investing in its talents is essential to its long-term success.

Deezer's commitment to people and talent development is manifested through a comprehensive program that encompasses:

- **Training opportunities:** Deezer provides a variety of learning and development resources, including internal workshops, online courses, and mentorship programs. Deezer also support employees in pursuing external certifications and educational opportunities that contribute to their professional growth
- **Career progression initiatives:** Deezer offers clear career paths with opportunities for advancement, skill development and internal mobility opportunities via its Amplify program
- **Social programs and benefits:** Deezer recognizes that employee well-being is essential to overall success and offers a comprehensive benefits package (including health insurance, paid time-off and wellness programs)
- **Work-life balance:** Deezer promotes a healthy work-life balance through flexible work arrangements, efficient time management tools, and by encouraging its employees to fully utilize their vacation time

## Do's & Don'ts

- **Cultivate a growth mindset**, always be open to new ideas and learning opportunities
- **Take initiative in your learning**, volunteer for challenging projects and express your interest in learning new skills or areas
- **Promote continuous learning**, encourage employees to learn and develop new skills by offering them internal training, mentoring programs, and external learning opportunities
- **Share your ideas constructively and practice active listening**, foster open and transparent communication by creating spaces for dialogue and encouraging constructive feedback
- **Recognize and celebrate individual and team successes**, all contributions are valued
- If possible, **support flexible working arrangements** that balance the different needs of employees with the needs of Deezer

If you have any questions, please contact our Human Resources Department ([hr-ethics@deezer.com](mailto:hr-ethics@deezer.com)).

# ENSURING HEALTH AND SAFETY AT WORK

## Key principle

The protection of health and safety at work is a key priority for Deezer.

Deezer is committed to create a healthy and safe work environment. Deezer strives to identify, limit and control the impact that its activities and work environment may have, in the short, medium and long term, on the environment and its employees.

To achieve this, Deezer has designed policies, procedures and action plans to continuously improve and maintain its performances as well as optional training programs for its employees to teach them how to prevent or respond to work-related safety risks.

In addition to preventing any physical risks, Deezer has also set up a psychosocial risk prevention plan and tools to prevent the emergence of psychological risks, including:

- [Workplace Options](#), a psychological helpline available to all employees 24/7
- [One Trust](#), a whistleblowing solution to report any threats to the health, safety or the environment

## Do's & Don'ts

- **Always follow all safety regulations and procedures** and be aware of your surroundings and potential hazards in the workplace
- **Take advantage of Deezer's safety training programs** to learn how to identify and prevent workplace risks
- **Maintain a healthy work environment**, practice good ergonomics at your workstation to prevent musculoskeletal injuries and take regular breaks to avoid fatigue and maintain focus
- **Seek support**: don't hesitate to utilize Deezer's resources for mental and emotional well-being, if you're experiencing stress or burnout, reach out to the to your manager or the Workplace Options helpline
- **Report any threats to the environment, health and/or safety** in the workplace via [One Trust](#) by following the guidance provided in [Deezer's Reporting Policy](#)

Any situation that could represent a risk to health or safety must be reported to the Human Resources Department ([hr-ethics@deezer.com](mailto:hr-ethics@deezer.com)).

# PROMOTING DIVERSITY & INCLUSION

## Key principle

Deezer strives to create an inclusive work-environment where all employees feel respected, heard and treated equally.

Deezer prioritizes building a diverse and inclusive workforce that reflects the richness of its customer base. Deezer believes that fresh and different thinking fosters a stimulating work environment, empowers better decision-making, and sparks creativity for all employees.

Deezer's comprehensive Diversity & Inclusion (D&I) program addresses four key areas: gender equity, ethnicity/culture, disability, and LGBTQ+ inclusion. It operates through a three-pronged approach: education, inspiration, and impact.

Deezer has implemented a global D&I program to ensure communication between its employees is respectful and inclusive, including:

- An [e-learning program](#) about microaggressions
- Multiple workshops and talks on gender equity, ethnicity/culture, disability and LGBTQ+

As such, Deezer has a zero-tolerance policy against any behavior or language that is abusive, offensive or unwelcome.

## Do's & Don'ts

- [Treat everyone with dignity and respect](#), both verbally and non-verbally and avoid jokes, stereotypes, or language that could be offensive to any colleague
- [Be curious about your colleagues' backgrounds, experiences, and perspectives](#), value diversity of thought and create a space where everyone feels comfortable sharing their ideas
- [Use inclusive language that avoids bias and stereotypes](#), be mindful of nonverbal cues and ensure your communication is respectful
- [Pay attention to your colleagues' ideas and concerns](#), demonstrate empathy and understanding when communicating with others
- [Support recruitment, retention, promotion, training, and development practices based on meritocracy and fairness](#)
- [Take advantage of Deezer's D&I awareness initiatives](#), and encourage your colleagues to do the same

If you have any doubts or questions, please contact our Human Resources Department ([hr-ethics@deezer.com](mailto:hr-ethics@deezer.com)).

# FIGHTING HARASSMENT, DISCRIMINATION AND VIOLENCE AT WORK

Deezer has a zero-tolerance policy against all forms of harassment, discrimination and violence in the workplace.

Discrimination is the unfair treatment of an employee or job applicant on the basis of a protected characteristic or personal belief.

Harassment is unwanted behaviour which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

Both harassment and discrimination are offences and sanctions can include prison sentences and financial penalties.

Deezer holds its employees and leaders accountable, any form of discrimination, intimidation or harassment or any behavior or language that is abusive, offensive or inappropriate will not be tolerated and will be sanctioned.

Deezer encourages everyone who is a victim or witness of harassment, discrimination, bullying or violence to report it.

To ensure communication between its employees is respectful and inclusive, Deezer has implemented tools including:

- A [charter](#), which contains simple rules for behaviour and communication at work
- [One Trust](#), a whistleblowing solution for reporting acts of discrimination, harassment, or any other form of violence in the workplace

## Do's & Don'ts

- [Treat your colleagues with dignity and respect](#), on all occasions and platforms, and regardless of their function. Do your best to foster a welcoming environment
- [Refrain from any form of violence, discrimination, bullying or harassment](#), whether it is sexual, psychological or on the basis of race, religion, ethnicity, nationality, sex, age, disability, sexual orientation, gender identity or other characteristic protected by local law, it being one-off or repeated
- [Take all appropriate measures to prevent and identify all types of harassment and bullying](#): read the [charter](#) and complete all related mandatory trainings
- [Report any act of discrimination, harassment, or any other form of violence in the workplace via One Trust](#) by following the guidance provided in [Deezer's Reporting Policy](#)

Report any form of discrimination or harassment that you notice to our Human Resources Department ([hr-ethics@deezer.com](mailto:hr-ethics@deezer.com)).

# REPORTING VIOLATIONS

# REPORTING VIOLATIONS

## Speak up!

At Deezer, we encourage open, transparent and free communication. This is especially true if you are a victim or witness of behavior or actions that may be contrary to the law, regulations or our Code of Ethics.

If you encounter any situation, practice, or behavior that raises concerns, please speak up. Your voice has the power to make a positive difference and help us build a better Deezer.

Deezer is committed to investigate all reported problems, conduct thorough investigations, and implement all appropriate corrective measures, including disciplinary sanctions and legal actions, regardless of who may be the perpetrator of such acts.

Deezer also ensures the protection of any individual reporting in good faith an actual or potential violation via:

- Anonymous reporting: [Deezer's Reporting Policy](#) allows anonymous reports
- Confidential reporting: Deezer protects the identity of the reporter and imposes a strict confidentiality obligation on any persons authorized to access this information during the course of the investigation. Any breach of this confidentiality obligation will give rise to disciplinary sanctions - or even civil or criminal penalties if required by law
- No retaliation: When a concern is reported in good faith, and whether or not it is confirmed by further investigation, Deezer will not take any action against the reporter and will not tolerate any detrimental treatment or retaliation against them

## How to report

[Deezer's Reporting Policy](#) allows alerts to be reported via 3 main channels:

- **To the line manager**, who will then transmit the alert to the Legal & Compliance Department or the Human Resources Department
- **Directly to the Compliance Officer or the Human Resources Department**, using dedicated email addresses ([compliance@deezer.com](mailto:compliance@deezer.com) / [hr-ethics@deezer.com](mailto:hr-ethics@deezer.com))
- **Via One Trust**, our whistleblowing system
- To the Health, Safety & Working Conditions Committee, using its dedicated email address ([cssct@deezer.com](mailto:cssct@deezer.com))

Regardless of the channel used to report the alert, the processing procedure is then unique and consists of 1) an assessment of the admissibility of the alert, 2) an in-depth investigation of the alert and 3) a decision on any action to be taken.

For more information on how to report an alert, consult [Deezer's Reporting Policy](#)

If you have any doubts or questions, please contact our Compliance Officer ([compliance@deezer.com](mailto:compliance@deezer.com)).

