

MEDIA24 SPEAK UP POLICY

Media24 is a subsidiary of Naspers Limited, a company that is listed on the JSE Limited and the London Stock Exchange. From a corporate governance perspective, Media24 uses the Naspers Speak Up policy.

Speak Up Introduction

Why is Speaking Up important?

As a group¹, we are committed to doing business in an ethical, legal and socially responsible way. But it's possible you might come across a situation or behaviour that concerns you, or that seems to breach the law, the Media24 Code of Business Ethics & Conduct (Code), or any other group policy.

If this happens, we encourage you to **Speak Up**, so we have the opportunity to deal with the situation or concern – and to support you, if you need us to.

Please remember that staying silent could cause the situation to become worse. We encourage you to Speak Up if you have reason to believe that misconduct or a breach is likely to happen, not just if misconduct or a breach has happened.

We will not tolerate any retaliation against anyone who, in good faith, makes a Speak Up report in line with this policy. Concerns that are raised will be treated confidentially and, if desired and permitted under local law, anonymously.

What's the purpose of this Speak Up policy?

This policy explains why it is important to raise, in good faith, concerns about possible misconduct or breaches. It also explains when, how and where you can raise such concerns in confidence, with respect for your privacy and without fear of retaliation.

Who can Speak Up?

This policy can be used by everyone working for or on behalf of the group worldwide, including contractors, job applicants and former employees. It is also available to any person or party with whom the group has, or had, a business relationship.

¹ In the context of this policy, the group refers to a company in which Naspers has a shareholding of more than 50% (whether direct or indirect).

What concerns does this Speak Up policy cover?

We support a Speak Up culture where everyone feels safe to raise and discuss any concerns. You can use various Speak Up channels to report concerns about possible misconduct or breaches of the law, our Code, or any other group policy.

You can use this policy to raise concerns about, for example, the following areas:

- Fraud
- Bribery or corruption
- Money laundering or terrorism financing violations
- Breaches of sanctions and export control laws
- Conflicts of interest
- Human rights violations
- Discrimination or harassment
- Breaches of competition laws and rules
- Breaches of privacy laws
- Inadequate financial and non-financial record keeping
- Environmental, health and safety violations
- Improper use of company resources
- Insider trading
- Misuse of confidential information
- Breaches of applicable law, our Code or any other group policy
- Retaliation against anyone for Speaking Up

What's not covered by this Speak Up policy?

This policy should not be used:

- To report events that are an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or call your country's emergency phone number
- For grievances about your terms of employment
- For personal legal disputes
- For consumer complaints
- To make false accusations or to raise concerns other than in good faith.

Please remember that misusing the Speak Up channels is a violation of our Code and is not protected against retaliation under this policy. We consider misuse to be an extremely serious matter and it will result in disciplinary action.

Making a Speak Up report

How and when should I Speak Up?

You can raise concerns through a variety of channels, without replacing your regular reporting lines or complaints procedures within your business.

We encourage you to Speak Up as soon as possible; ideally when the potential misconduct or breach can still be prevented, and before the situation escalates. If you have reason to believe that

misconduct or a breach has happened, or might happen, we encourage you to Speak Up with the facts that you know and the information you have. We do not expect you to have all the answers and we ask you not to investigate any concern yourself.

If you think that misconduct is happening, we encourage you to talk directly to the person involved. If this isn't possible, or if you do not feel comfortable, you can raise your concerns using these additional channels:

Speak Up channels within your business line:

- **Your line manager:** We encourage you to discuss your concern with your line manager. We know that is not always easy, but we support an open and transparent approach
- **HR:** If you do not feel you can talk to your line manager about the concern, you can discuss it with HR.

Speak Up channels outside your business line:

- **Ethics & compliance officers:** Media24's ethics & compliance officer, along with the group Ethics & Compliance team, can give you confidential advice and support
- **Speak Up service:** If you feel that your concern cannot be dealt with through any of the above channels, you can use the Speak Up service.
 - This service allows you to raise concerns confidentially, anonymously (if necessary), and in your own language
 - The Speak Up service is run by an independent provider and is available 24/7
 - The group Ethics & Compliance team will get a transcript of your report and will be able to communicate with you confidentially via the Speak Up service.

There are two ways to report a concern using the Speak Up service:

- Online via the Speak Up service website (<https://speakup.naspers.com>)
- By phone (telephone numbers available on the website above)

If you are not a group employee but you have, or had, a business relationship with the group (e.g. as a supplier) and you wish to raise a concern, please contact your group contact person. If this is not possible or you do not feel comfortable, you can also contact the group Ethics & Compliance team directly or use the Speak Up service.

What about reporting externally?

Reporting directly to an enforcement or regulatory authority could be an option in exceptional situations; generally where public interest is at stake.

Some countries have specific regulators² you can report issues to, depending on the situation. For more information about such situations, please contact the group Ethics & Compliance team.

² In the Netherlands, complaints concerning reasonable suspicions of wrongdoing involving the public interest (misstanden met een maatschappelijk belang) can also be filed externally, with the Institute for Whistleblowers (Huis voor de Klokkenluiders).

We believe our Speak Up processes are resilient. We encourage anyone worried about possible misconduct to report it internally first, if possible, using any of the Speak Up channels listed in this policy.

What kind of information will I need to provide?

No matter which channel you use to Speak Up, please provide as much detailed information as you can, so we can respond in the best possible way.

Examples of information to include when making a report:

- The background, history and reason for the concern
- All available information about the concern (ask yourself: who, what, when, where, how and why)
- Any documents/information that may support or act as evidence of your concern.

We can only follow up a report if it contains enough information, or there's a possibility of getting more details. Whether the report is investigated further will often depend on the amount of information you provide in your report. It may be difficult to follow up a case properly or investigate a concern if we only have limited information.

After making a Speak Up report

What happens after I Speak Up?

By Speaking Up internally, you'll give us the opportunity to look into the matter, take necessary and appropriate action, and support you, if you need it.

If you raise your concern via the Speak Up service, your report will be routed back to the group Ethics & Compliance team for further handling and you'll get confirmation of receipt within seven days.

When you submit your concern to the Speak Up service, you'll be given a unique code called a 'report key'. You can use this key to call back or access the Speak Up service website to check progress on your report.

Please note your report key for the Speak Up service is particularly important if you choose to remain anonymous³, because we will only be able to contact you through the website.

If you make your report in person or by email to the Media24 ethics & compliance officer, he/she will discuss and agree with you how the matter will be followed up. If necessary, confirmation of receipt of the report will be made within seven days.

If you make reports in your own line of business (e.g. to your manager or HR) you will not get a specific confirmation of receipt.

³ Anonymous reporting may not be legally permitted in all jurisdictions.

How will the group Ethics & Compliance team review or investigate my concern?

When the group Ethics & Compliance team gets a report, they will make an initial assessment to understand:

- What is the report about?
- Is more information needed?
- Is the person who reported willing to discuss the matter further, either directly or anonymously?
- Has the person who reported said they feel safe?
- How can we support the person who reported?
- What is necessary to proceed?

Because every situation is different, the approach will depend on the nature of the issue. Some matters can be resolved quickly, while others will need an in-depth investigation. The group Ethics & Compliance team will explain the expected approach and next steps with you as much as possible.

If your report does not lead to a formal investigation, we will carefully assess what other actions are appropriate and how we can give you any support you need.

All reports received via these channels are logged in a case management system that processes personal data confidentially and in line with privacy laws.

If an investigation is needed, it will focus on an objective, factual analysis of the case. This will allow management to make informed decisions based on advice from the Speak Up investigation committee.

Any investigation will respect all relevant local laws and regulations, and be in line with our own internal investigation procedures and protocols. Depending on the specifics of the case, the Speak Up investigation committee will appoint a suitable (internal and/or external) investigation team. Selected investigators will be knowledgeable and free of any conflict of interest in the case.

Investigation teams will always work under strict confidentiality and under the supervision and instruction of the Speak Up investigation committee. Investigations will be conducted in an independent, fair and unbiased manner, with respect for everyone involved.

If you become involved in an investigation, you will be required to cooperate fully and answer all questions completely and honestly.

Everyone involved – including those accused of misconduct – is entitled to confidentiality. So, if you're involved in, or learn about an investigation, you must keep the matter confidential.

Throughout the investigation, the group Ethics & Compliance team will be the central point of contact for any questions or issues.

What happens when an investigation is completed?

At the end of an investigation, the Speak Up investigation committee will make a determination about the report.

Based on this determination, and after taking advice (where appropriate) from legal, finance, HR and other specialist staff or advisers, the relevant management team will decide on the measures to be taken.

Any measures taken will be in line with relevant laws and regulations, as well as the Media24 HR policies and procedures. Measures against employees could include dismissal or demotion, while external parties could have their business relationships terminated.

We aim to close all Speak Up investigations within three months of the confirmation of receipt⁴. If it's necessary to exceed this period, the group Ethics & Compliance team will let you know and explain why there's a delay.

They'll also let you know the status of your report, the overall findings and whether or not any actions have been, or will be, taken. We might not always be able to give you full details of the outcome of a report (or the actions taken) because of confidentiality and privacy rules, and the rights of everyone involved.

If relevant laws or regulations have been breached, the group may report the breach to the relevant enforcement authorities (such as the police or regulatory bodies) in line with the relevant laws and regulations and/or take legal action itself.

What should I do if I have a concern about how my report was handled?

If you feel that a matter you reported, or were involved in, has not been properly investigated, or was not handled in line with this policy, please contact the group Ethics & Compliance team to discuss the options that you have (including the possibility of reporting the concern externally).

What if my concern directly involves a member of the management team, the Speak Up investigation committee, a committee of the Media24 Board or the Media24 Board itself?

In such cases, the chair of the Media24 Board can be contacted directly at BoardSpeakUp@naspers.com and will be responsible for the coordination of any follow-up action.

⁴ For reports in scope of the EU Whistleblowing Directive (2019/1937) the maximum duration of an investigation is three months after confirmation of receipt of the report.

Our commitments when Speaking Up

We are committed to protecting anyone who helps to safeguard the reputation of our group by Speaking Up. That is why we have committed to the following key principles:

Non-retaliation

We do not tolerate any form of threat, retaliation or other action against anyone who, in good faith, has made, or helped to make, a Speak Up report in line with this policy.

Any such threat, retaliation or other action should immediately be reported to the group Ethics & Compliance team. We will treat it as a violation of our Code, which may lead to disciplinary measures.

Confidentiality

Details, such as your identity and the identity of anyone mentioned in a report made via the Speak Up service or to the Media24 ethics & compliance officer, will generally be kept confidential during and after any investigation. This information will be shared on a need-to-know basis with group officers, specialist staff and/or employees and/or external investigators.

Under some laws, we may be required to disclose the details of a report and the results of an investigation. We will limit such disclosures to what's legally necessary and protect your identity as far as we can.

Other than these examples and where possible, we will discuss any disclosure of your identity with you before it is made (whether internally/externally).

Anonymity

Although you can Speak Up anonymously via the Speak Up service (if you prefer and local laws allow), we strongly encourage you to reveal your identity when reporting a concern. Knowing who made the report makes it easier for us to support you, helps further investigation of the matter, and increases the chances of a satisfactory outcome.

Remember! Anonymous reports can appear less credible and are generally more difficult to investigate and resolve.

Privacy

We are committed to protecting the privacy of everyone involved in the Speak Up process (including anyone involved in an investigation).

We will do everything reasonable to safeguard personal data from unauthorised access and processing. Any personal data obtained as part of this policy will be processed in line with the Media24 Policy on Data Privacy Governance and will only be used for the purposes explained in this Policy, or to comply with the law or an important public interest.

Any personal data involved will be processed confidentially and secured from other (employee) information systems or employee files in a separate case management system.

Any investigation will be performed in a privacy-compliant manner.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to take any follow up actions or to meet the group's legal or financial needs, but in any case, not longer than allowed by provisions of applicable law. If judicial or disciplinary proceedings are initiated, the personal data provided will be kept until those proceedings are definitively closed. Recordings of any disciplinary measures against an employee as a result of an investigation will be done in compliance with the Media24 Records Management Policy.

Administrative information

Contact details : Prosus NV C/O group E&C, Gustav Mahlerplein 5, 1082MS
Amsterdam, The Netherlands

Content owner : group Ethics & Compliance

Contact info : E&C@prosus.com

Effective date : February 2022

Version : v.1.0

Which document it replaces: This Speak Up policy supersedes any Whistleblowing Policies and Fraud Reporting Procedures within the group. (group: Prosus Whistleblower Policy, 20 November 2020). For avoidance of doubt, this includes the Media24 Whistleblower policy, November 2021.

Notes: The group Ethics & Compliance team is responsible for informing the Media24 and Naspers Boards, and more specifically, the Naspers Sustainability and Risk Committees and Media24 Risk Committee, on the status of Speak Up throughout the group (including case updates). In cases of suspected fraud irregularities of a financial nature, the Naspers and Media24 Audit Committees are also informed.

If investigations are conducted as the result of a report, the Speak Up investigation committee is responsible for overseeing them. This policy has a complementary character: any applicable local laws or regulations remain valid. This policy may not conflict with any local laws or regulations, and in such a case, the law or regulation would prevail. Where the terms of this policy are stricter than the applicable legislation or provide additional safeguards, rights or remedies, the terms of this policy will prevail.

Implementation requirement: Applicable local laws may lead to the conclusion that an additional local policy or procedure may need to be implemented. In such cases, businesses within the group are required to indicate this to the group Ethics & Compliance team and confirm if this policy has been integrated into any applicable local policy or procedure. Any necessary deviation from this policy must be supported by a waiver request to be filed with the group Ethics & Compliance team.

Contact details - Media24 ethics and compliance officer:

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