

#### **Code of Business Conduct and Ethics**

fuboTV Inc. (together with any subsidiaries, "fuboTV" or the "Company") has always maintained strong principles guiding the way we do business and the way we treat each other, our customers, clients, contractors, suppliers, vendors and business partners.

These values are communicated to employees in writing, orally and through our daily interactions. Every employee is expected to and should be proud to meet our high standards of behavior, exemplified though our day-to-day decisions. fuboTV also benefits greatly from our long-term employees who help teach newcomers what it means to conduct business as a representative of fuboTV. We want to ensure that every employee shares our way of doing business and understands the high priority that we place on ethical business conduct.

fuboTV succeeds as a result of our creative, diverse workforce. The different backgrounds, traditions, views and talents each of us brings to fuboTV enrich the company as a whole and help achieve executional excellence.

This Code of Business Conduct and Ethics ("Code") represents an overview of the policies that govern all employees' actions. It is not a replacement for operating unit policies and procedures that address the specifics of the business and environment in which they operate, or which may impose stricter or more detailed requirements. Nor does it cover every potential situation. But, this Code does establish general principles and specifies where to go for answers when you have questions.

### **Purpose**

This Code is designed to deter wrongdoing and to promote:

- · fair and accurate financial reporting;
- compliance with applicable laws, rules and regulations including, without limitation, full, fair, accurate, timely and understandable disclosure in reports and documents fuboTV files with, orsubmit to, the U.S. Securities and Exchange Commission ("SEC") and in fuboTV's other public communications;
- the prompt internal reporting of violations of this Code and accountability for adherence to the Code;
- the protection of the fuboTV's legitimate business interests, including its assets and corporate opportunities;
- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
   and
- a culture of honesty, transparency and accountability.

This Code applies to all directors, officers and employees (who, unless otherwise specified, will be referred to jointly as "employees") of fuboTV. In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our "principal financial officers." This Code serves as a guide, and fuboTV expects employees to use good judgment and adhere to the high ethicalstandards to which fuboTV is committed.

For purposes of this Code, fuboTV's General Counsel serves as the Compliance Officer. The Compliance Officer may designate others, from time to time, to assist with the execution of his or her duties under this Code.

Employees are expected to read the policies set forth in this Code and ensure that they understand and comply with them. The Compliance Officer is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation. You should direct any questions about this Code or the appropriate course of conduct in a particular situation to your manager, the



Compliance Officer or the People Operations team, who may consult with fuboTV's outside legal counsel or fuboTV's board of directors (the "Board"), as appropriate.

You should read this Code in conjunction with other policies applicable to employees.

#### Financial Reports and Other Records - Disclosure

Employees are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non-financial information that may be material to fuboTV to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that fuboTV files with government agencies, including the SEC, or releases to the general public.

Each employee involved in fuboTV's disclosure process must familiarize themselves with the disclosure requirements applicable to us and our business and financial operations, and must not knowingly misrepresent, or cause others to misrepresent, facts about fuboTV to others, whether within or outside fuboTV, including to fuboTV's independent auditors, governmental regulators and self-regulatory organizations.

Employees must maintain all of fuboTV's books, records, accounts and financial statements in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Furthermore, employees must ensure that all books, records, accounts and financial statements conform both to applicable legal requirements and to fuboTV's system of internal controls.

Employees must carefully and properly account for all assets of fuboTV. Employees may not establish any undisclosed or unrecorded account or fund for any purpose, even if suchaccount is established for the benefit of fuboTV. Employees shall not make any false or misleading entries in fuboTV's books or records for any reason, or disburse any corporate funds or other corporate property without adequate supporting documentation and authorization. Employees shall not misclassify transactions related to accounts, business units or accounting periods. Each employee bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

### **Conflicts of Interest**

You must act and behave in fuboTV's best interests and not based on personal relationships or benefits real or perceived. You should avoid situations where your personal activities and relationships conflict, or appear to conflict, with fuboTV's interests.

The following are some examples of situations that might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by, the Compliance Officer or the Board:

- Family Members. Conducting business on behalf of fuboTV with family members or anorganization with which a family member is associated, unless such business relationship has been disclosed to, and authorized by, fuboTV and is a bona fide arms-length transaction. "Family members" include a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and any person (other than a tenant or employee) sharingthe household of an employee.
- Employment Relationships with or Financial Interests in Other Businesses. Accepting compensation in any form for services performed for fuboTV from any source other than fuboTV or being employed by, serving as a director of, or providing services to a company that the individual knows or suspects is a material customer, supplier or competitor of the Company (other than services to be provided as part of an employee's job responsibilities for fuboTV). In addition, employees should not have an undisclosedmaterial financial interest in a competitor, supplier, customer or business partner of fuboTV.

- Improper Conduct and Activities. Engaging in any conduct or activities that materially disrupt or impair fuboTV's relationship with any person or entity with which we have or propose to enterinto a business or contractual relationship.
- Loans or Financial Transactions. Obtaining loans or guarantees of personal obligations from, or
  entering into any other personal financial transaction with, any company that the individual knows or
  suspects is a material customer, supplier or competitor of the Company. This guideline does not
  prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- **Gifts and Gratuities.** Obtaining any material (as to him or her) personal benefits or favors because of their position with fuboTV. This Code does not prohibit modest meals, gifts, or entertainment to or from private third parties that conduct business with fuboTV, provided the value is reasonable (not lavish or excessive), is in good taste, related to a legitimate business purpose, lawful under local laws, and properly recorded in fuboTV's books and records. Any questions about gifts and gratuities should be directed to the Compliance Officer and your manager.

For purposes of this Code, a company is a "material" customer if the customer has made payments to fuboTV in the past year in excess of \$1 million or 2% of fuboTV's gross revenues, whichever is greater. A Company is a "material" supplier if the supplier has received payments from fuboTV in the past year in excess of \$1 million or 2% of the supplier's gross revenues, whichever is greater. If you are uncertain whether a particular company is a material customer or supplier, please contact the Compliance Officer for assistance.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. fuboTV requires that employees and directors disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your manager, the Compliance Officer or the People Operations Team, or if you are a director or executive officer, to the Board. The Compliance Officer, the People Operations Team or the Board, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that could give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Board, and any such approval will not be considered a waiver of this Code.

# **Corporate Opportunities**

Except as otherwise set forth in fuboTV's articles of incorporation and bylaws, employees owe a duty to fuboTV to advance fuboTV's business interests when the opportunity to do so arises. Employees are prohibited from taking for personal gain or directing to a third party to take, a business opportunity that is discovered through the use of corporate property, information or position, unless fuboTV has already been offered the opportunity and turned it down.

Employees are further prohibited from competing with fuboTV directly or indirectly during their employment with fuboTV and as otherwise provided in any written agreement with fuboTV.

Sometimes the line between personal benefits and what is a benefit to fuboTV is difficult to draw, and sometimes there are both personal benefits and benefits to fuboTV in certain activities. Employees should discuss with their manager, the Compliance Officer or the People Operations team if they have any questions.

#### **Protection of Assets, Confidentiality and Communications**

All employees should endeavor to protect fuboTV's assets and ensure their efficient use. Employees should treat fuboTV owned equipment with care and use the equipment and tools with fuboTV's interests in mind. Employees should also use good judgment in using fuboTV's assets for personal matters. We permit reasonable personal use of fuboTV owned equipment, but employees should be aware that all electronic information and equipment



owned by fuboTV remains the sole property of fuboTV. Any suspected incident offraud or theft should be reported immediately to the employee's manager and to the Compliance Officer for investigation.

In carrying out fuboTV's business, employees may learn confidential or proprietary information about our customers, suppliers or business partners. Confidential or proprietary information of fuboTV, and that of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

Subject to the terms of any confidentiality agreement applicable to you, as a general matter employees must maintain the confidentiality of information about fuboTV and other companies entrusted to them by fuboTV and use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party. Individuals with such information must also limit dissemination of the confidential information, both inside and outside fuboTV, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

The obligation to protect confidential information does not end when an employee leaves fuboTV. Any questions about whether information is confidential should be directed to the Compliance Officer.

Any employee who is contacted by a member of the financial community, the press or any other outside organization or individual, should refer them to fuboTV's Head of Investor Relations and/or Head of Communications. See "Public Communications and Regulation FD" below for more information.

### **Fair Dealing**

fuboTV does not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with fuboTV's customers, service providers, suppliers, competitors, business partners and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

#### **Compliance With Laws, Rules and Regulations**

All employees must respect and obey all laws when carrying out responsibilities on behalf of fuboTV and refrain from illegal conduct.

Employees have an obligation to be knowledgeable about specific laws, rules and regulations that apply to their areas of responsibility. If a law conflicts with a policy in this Code, employees must comply with the law.

Any questions as to the applicability of any law should be directed to the Compliance Officer. The following is a brief summary of certain topics about which employees should be aware:

- Antitrust. Antitrust laws (also known as "competition" laws) are designed to foster competitive markets and prohibit activities that unreasonably restrain trade. In general, actions taken in combination with another company that unreasonably reduce competition may violate antitrust laws. Certain types of agreements with competitors (including, but not limited to, agreements on prices and output) are always illegal and may result in criminal penalties such as prison terms for the individuals involved and large fines for the corporations involved. In addition, unilateral actions by a company with market power in the sale or purchase of a particular good or service may violate antitrust laws if those actions unfairly exclude competition. fuboTV is dedicated to complying with the numerous laws that govern competition. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and employees should reach out to the Compliance Officer before taking any action that may implicate these laws whenever appropriate.
- **Health, Safety and Environment.** fuboTV works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable.

Employees are responsible for complying with all applicable laws, rules and regulations governing health, safety and the environment.

- Fair Employment Practices. fuboTV strives to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in aprofessional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.
  - o fuboTV requires each employee to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice and harassment. We prohibit discrimination against or harassment of any team member on the basis of race, religion or religious creed (including religious dress and grooming practices), color, ethnic or national origin, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), nationality, national origin, ancestry, immigration status or citizenship, age, physical or mental disability, medical condition (including genetic information or characteristics, or those of a family member), military service or veteran status, marital status or family care status, sexual orientation, family medical leave, gender (including gender identity, gender expression, transgender status or sexual stereotypes), political views or activity, status as a victim of domestic violence, sexual assault or stalking, or any other basis or classification protected by applicable federal, state or local law.
  - Any employee who is found to have discriminated against another employee is subject discipline up to and including termination.
  - No individual will suffer any reprisals or retaliation for making complaints or reportingany incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination.
- Foreign Corrupt Practices and Anti-Bribery Laws. fuboTV has a "zero tolerance" policy and strictly prohibits all forms of bribery and corruption, regardless of whether they involve a publicofficial or a private person. Bribery and corruption are antithetical to our commitment to operating with the utmost integrity and transparency and are also prohibited under the laws of most countries around the world, including pursuant to laws such as the United States Foreign Corrupt Practices Act of 1977 and the United Kingdom Bribery Act of 2010. Employees should seek guidance from the Compliance Officer when they have any questions. Please see fuboTV's Anti-Corruption, Trade Controls, and Anti-Money Laundering Policy for more information.
- Insider Trading. Under federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Because employees will have knowledge of specific confidential information that is not disclosed outside fuboTV which will constitute material nonpublic information, trading in fuboTV's securities or inthe securities of those companies with which fuboTV does business by employees or persons employees provide material nonpublic information to could constitute insider trading, violating the law. It is an employee's responsibility to comply with these laws and not to share material nonpublic information. Please see fuboTV's Insider Trading Policy for more information.
- Maintaining and Managing Records. fuboTV is required by local, state, federal, foreign and other
  applicable laws, rules and regulations to retain certain records and to follow specific guidelines in
  managing its records. Records include all recorded information, regardless of medium or
  characteristics. Civil and criminal penalties for failure to comply with such guidelines can be severe for
  employees, agents, contractors and fuboTV.
  - Additionally, please note that all fuboTV issued devices, computers, hardware, cell phones, media, documents, records and information are the property of fuboTV. As such, fuboTV requires employees to cooperate with any request made by the Compliance Officer to preserve or

- produce any documents, records, information, devices, computers, hardware, cell phones or other media. Employees should consult with the Compliance Officer regarding the retention of records in the case of an actualor threatened litigation or government investigation.
- The Compliance Officer will notify employees if a legal hold is placed on records for which employees are responsible. The Compliance Officer determines and identifies what types of records or documents are required to be placed under a legal hold. If a legal hold is placed on records for which employees are responsible, employees must preserve and protect the necessary records in accordance with instructions from the Compliance Officer. Records or supporting documents that are subject to a legal holdmust not be destroyed, altered or modified under any circumstance. A legal hold remains effective until it is officially released in writing by the Compliance Officer. If anemployee is unsure whether a document has been placed under a legal hold, they should preserve and protect that document while they check with the Compliance Officer.

### **Public Communications and Regulation FD**

### **Public Communications Generally**

fuboTV places a high value on its credibility and reputation in the community. What is written or said about fuboTV in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data.

## Compliance with Regulation FD

In connection with its public communications, fuboTV is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for "fair disclosure"). Regulation FD provides that, when we disclose material non-public information about fuboTV to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. "Securities market professionals" generally include analysts, institutional investors and other investment advisors.

We have designated certain individuals as "spokespersons" who are responsible for communicating with analysts, institutional investors and representatives of the media. Any employee or director who is not a designated spokesperson of the Company should not communicate any information about fuboTV to analysts, institutional investors or representatives of the media, except at the request of fuboTV's designated spokespersons.

For more information on fuboTV's policies and procedures regarding public communications and Regulation FD, please contact the Company's General Counsel with any questions you may have about disclosure matters.

## **Compliance and Reporting**

Employees are encouraged to seek guidance from their manager, the Compliance Officer or the People Operations team when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding this Code should be brought to the attention of the Compliance Officer.

If an employee knows of or suspects a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), or an employee has concerns about a situation that they believe does not reflect fuboTV's culture and values, the employee must report it immediately to their manager, the Compliance Officer or the People Operations team. An employee may also report concerns anonymously via the Ethics Hotline that is available 24 hours a day, 7 days a week, by telephone at the phone numbers listed in Annex A or on the Internet at www.lighthouse-services.com/fubotv. Please see our Whistleblower Policy for more information.



All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. fuboTV does not permit retaliation of any kind for good faith reports of violations or possible violations.

Reported violations will be promptly and thoroughly investigated. As a general matter, the Audit Committee will oversee investigations of potential violations by directors or executive officers, and the Compliance Officer will oversee investigations of potential violations by other employees. However, it is imperative that the person reporting theviolation not conduct an investigation on their own. Employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Employees should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, employees are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, representatives of fuboTV, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with fuboTV and also be a criminal act that can result in severe penalties.

Employees who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, employees who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject employees to civil and criminal liability.

### **Protected Activity**

Nothing in this Code limits or prohibits employees from engaging for a lawful purpose in any "Protected Activity." "Protected Activity" means filing a charge or complaint, or otherwise communicating, cooperating or participating, with any state, federal or other governmental agency, including the SEC, the Equal Employment Opportunity Commission and the National Labor Relations Board. Notwithstanding any other policies in this Code (or elsewhere), employees are not required to obtain authorization from fuboTV prior to disclosing information to, or communicating with, such agencies, nor are employees obligated to advise fuboTV as to any such disclosures or communications. Notwithstanding, in making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute fuboTV confidential information to any parties other than the relevant government agencies. "Protected Activity" does not include the disclosure of any of fuboTV's attorney-client privileged communications; any such disclosure, without our written consent, violates our policies.

#### **Waivers of this Code**

Any waiver of any provision of this Code for our directors, executive officers or other principal financial officers must be approved by the Board, and promptly disclosed as required by law or the rules of the New York Stock Exchange. Waivers of this Code for other employees may be made only by the Compliance Officer and will be reported to the Audit Committee.

#### **Amendment**

fuboTV reserves the right to amend this Code at any time, for any reason. Amendments to this Code will be disclosed as required pursuant to applicable law.



# Acknowledgment

All new employees must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in employee personnel files. Failure to read this Code or to sign an acknowledgment form does not excuse any person from the terms of this Code



# Annex A

# **Toll Free Telephone Numbers:**

• English speaking USA and Canada: 833-222-3925

• Spanish speaking USA and Canada: 800-216-1288

• French speaking Canada: **855-725-0002** 

• Spanish speaking Mexico: **01-800-681-5340** 

# **AT&T USADirect**

 All other countries: 800-603-2869 (must dial country access code first <u>click here</u> for access codes and dialing instructions)