

v i d e  s e t i t a l i a

Ethical code

I INTRODUCTION

The code is the official document that fixes and expresses the ethical principles and values through which Videaset Italia is inspired in the accomplishment of its professional work.

All the members of the company must observe the code. It is made up by the rules Videaset Italia must follow in order to operate with transparency and correctness. It is binding for all the members of the staff. There is no case in which the pursuit of the benefit or the advantage of Videaset Italia can justify behaviour, which is not in accordance with the principles stated in this document.

The suppliers, the members, the consultants and all the subjects with whom Videaset Italia gets in contact within its activity will be acquainted with the obligations described in this ethical code. All those that are interested and are inside and outside the company (i.e. stakeholder) can give their contribution to its drafting or its improvement.

Even though Videaset Italia is a stock company that pursues the aim that characterise its social object, it carries out its activities with ethical integrity and correctness.

✓ **Values of reference**

The values of Videaset Italia take origin from the enthusiasm towards show business, a sector Videaset Italia has learned to know when dealing with the requests of the productions, of the artists and of who aims at becoming one.

It supports the artist giving technical, logistic, artistic and psychological support during the casting and the performance. The engagement becomes, therefore, to follow the artist, from the youngest one to the most mature, in its artistic and working experience, taking advantage of all the best occasions in order to build and to spread his/her image through the channels Videaset Italia has succeeded in creating and managing day by day becoming, therefore, not only a professional but also an ethical imperative.

✓ **Bound addressees of the ethical code**

They are all those people who work for Videaset Italia, penalty the removal from the company. All the external subjects of Videaset Italia (customers, sponsors, community and public administration) are not bound addressees of the dispositions of this code. The respect and the sharing of the principles contained in this code by subjects who are not bound could constitute a criterion of choice adopted by Videaset Italia for the selection of subjects with whom to entertain working relationship.

II OUR VALUES AS PRINCIPLES OF CONDUCT

- ✓ **Protection of the person:** we do not adopt damaging behaviours when dealing with everyone's ethical and personal convictions and preferences;
- ✓ **Care and accuracy in the execution of the contracts:** the contracts and the job assignments are fulfilled according to what established in an aware way by the parties with the exclusion of any vague application of generic and/or doubtful condition that could create confusion and damage of the own customers and/or counterpart.
- ✓ **Transparency:** Videaset Italia assures the most complete and transparent information about the guidelines of the activity through publications and/or communications to make any possible change of interest of the Company opportunely known.
- ✓ **Honesty:** Videaset Italia operates legally, respecting the civil and penal national and international laws and taking inspiration from this code for the respect of the ethical norms for its own functioning and the interests of its own customers.
- ✓ **Confidentiality:** in order to protect the customer we treat every information in an appropriate way. To Videaset Italia this means the protection of the confidentiality of personal data contained in data banks and in personal archives, the engagement so that all the fulfilment expected by the normative dealing with privacy are observed, adapting immediately to the eventual normative modernizations. The treatment to which the collected data will be submitted, exclusively deals with the accomplishment of the purposes related to the specific activity and in the respect of the contract signed between the parties. Moreover the official secret will be respected and

the news and information will be maintained confidential. The firm guarantees the confidentiality also once the contract ends.

- ✓ **Ambient protection:** the atmosphere is a primary good. It must be the centre of the daily way of acting looking for a sustainable equilibrium and considering the rights of the present and future generations. Videaset Italia commits itself to assure a positive ambient impact of its own activities, the prevention of the risks for the ambient, not only in the respect of the regulation, but taking the technological innovations of the development of the scientific research and the best experiences in this sector into consideration.
- ✓ **Health care:** Videaset Italia commits itself to adopt all the security measures required by the technological evolution and does its best to guarantee physical and ethical integrity of the employees and of the customers inside the structures in which Videaset Italia becomes part when dealing with the jobs.
- ✓ **Impartiality:** when getting in contact with all the parties, Videaset Italia avoids discriminations based on age, race and ethnic origins, nationality, political opinions, religious beliefs, sex, sexuality or health conditions of its interlocutors. All the customers of Videaset Italia are treated with equal respect and consideration, and they will not be discriminated neither directly nor indirectly, when dealing with one or more factors, included religion, genre, sexual trend, conscience and personal convictions, physical appearance, skin colour, language, ethnic or social origins, citizenship, personal or health conditions, pregnancy, familiar choices, age. A direct discrimination exists when, on the basis of one of the previously pointed out reasons, a person is treated less favourably than how another has been or would be treated in a similar situation. An indirect discrimination exists when an apparently neutral dispositions, criterion or praxis may disadvantage

people emerged according to those factors, except that such dispositions, criterion or praxis are objectively justified by a legitimate purpose and the means employed for its attainment are appropriated and necessary. In order to assure complete parity, the principle of not discriminating does not prevent the maintenance or the adoption of specific measures to avoid or to compensate correlated disadvantages. Moreover Videaset Italia does not tolerate abuses or annoyances of sexual nature, understood as lesive and discriminating behaviour of the personal sense of human dignity.

Integrity: who represents Videaset Italia does not use the office in order to pursue purposes or in order to achieve private and personal benefits and does not take advantage of the position that he/she covers in order to obtain profits or benefits in external relationship, also private.

Who works with the name and on behalf of Videaset Italia must avoid receiving benefits that can be or can appear benefits to influence its independence of judgment and impartiality, with the exception of gifts of moderate value. In case of illegitimate pressures or the offer of gifts, benefits or other profits exceeding a moderate value, the representative must communicate it opportunely.

Clash of interests: to avoid real clashes of interests, both potential or foreseen, it is helpful to create an atmosphere of confidence and mutual respect with the customers, the employers and the public. Videaset Italia aims at deserving the confidence of the public avoiding situations where the personal and professional interests of the single one meet with the interests of the society and at avoiding actions and circumstances that can compromise a good professional judgment or create a conflict between personal and professional interests. In running any activity, situations where the subjects involved are, or

could only appear in clash of interest, must always be avoided. For example, when a member pursues an interest, which is different from the mission of the firm or “personally” benefits of the business opportunities of the organization.

- ✓ **Fair competition:** Videaset Italia takes inspiration from the fair competition when in a professional relationship with competitors. It is an instrument that stimulates a constant improvement of its efficiency and quality of the services offered to the customers.
- ✓ **Quality of the services and products:** Videaset Italia commits itself to work in order to satisfy and protect its own customers, listening to the requests that can improve the quality of the products and services and working in order to let its own activities of research, development and commercialization reach an elevate standard of quality.
- ✓ **Responsibility towards the society** Videaset Italia is aware of the influence (indirect also) that its own activities can have on external situations. It carries out the politics of investments in an environmentally sustainable way, respecting the local and national communities, and supporting initiatives of cultural and social value in order to obtain an improvement of its own reputation and social acceptance.
- ✓ **Professionalism and valorisation of the human resources:** Videaset Italia aims at guaranteeing a high degree of professionalism in the execution of the tasks assigned to its own members and, in order to reach this aim it commits itself to bring out the competences of its own resources through the predisposition of suitable formative instruments and of professional modernization and development.
- ✓ **Competence:** the competences and the experience are developed through a constant net of mutual understanding, credibility and relations between the customer and Videaset Italia, between the

member and Videaset Italia and between all the stakeholder¹ with Videaset Italia.

- ✓ **Loyalty:** Videaset Italia is faithful to those represented by it.
- ✓ **Confidence:** Videaset Italia cannot be winning without the mutual confidence of all the subjects who give their contribution every day. The confidence is based on a mission, which is shared, on the respect everyone gives to the prearranged and shared values: every subject is, therefore, engaged to its strict observance.

¹ In this section the attention is towards stakeholders like partners, the social body, the staff etc.

III INNER RELATIONSHIP

- ✓ **Equal job opportunities** for all the employees on the basis of the professional qualifications and the capacities, without any discrimination.
- ✓ **A work place which is free from any form of intimidation**, where each person is treated as a colleague and member of a team, in the respect of its ethical principles, avoiding undergoing illicit conditioning or undue uneasiness.
- ✓ **Relationship with the shareholders**, as it is a priority interest (not only from an economical point of view). The investment of its own shareholders, to carry out a politics that assures them, time after time, an adequate economic and social feedback through the optimization of the available resources but also the increase of its competitiveness not only from an economical point of view but also of reputation and solidity.
- ✓ **Professionalism and valorisation of the human resources**: Videaset Italia guarantees a high professionalism when executing the tasks assigned to its own members.
- ✓ **The staff** must respect the rights of the customers, suppliers, business partners and competitors of Videaset Italia and must be transparent in the relationship with them, in compliance with the law. It is forbidden to take advantage of anyone in an unfaithful way through deceit, false information, manipulations, constriction, abuse of confidential information or any practical business matter intentionally unfaithful.
- ✓ **Management of confidential information of other subjects of the company**: the confidential information of other subjects must be

managed according to the current agreements with those subjects and according to the enforceable norms. It is not allowed to consciously accept information offered from third parties, among which customers, suppliers or business partners, introduced like confidential or that seem confidential according to the context or the circumstances, unless an appropriate agreement of confidentiality has been signed with the party that supplies the information. If more detailed or exhaustive information which are not necessary or opportune for the immediate scope are received, they do not have to be accepted. If the company receives confidential information, it will do its best to let the conditions of the related agreement of confidentiality be respected, included all the obligations related to the restitution or destruction of the confidential information, the use of confidential information which must be limited exclusively to the scope of their communication, the confidential information which must be released exclusively to the other employees, representative or members of the company that must know them in order to carry out their job in the company. In particular the agent must expressly abstain from any behaviour that can prefigure to the eyes of the customer participations to casting according to false information, manipulations of information, abuse of information, or any intentionally incorrect business.

IV APPLICATION AREAS

- ✓ **Relationship with the costumers**
Customers represent the fundamental fortune of Videaset Italia. The contractual relationship and the communication with them are based on principles of correctness and honesty, professionalism, transparency and, however, on the maximum collaboration. Videaset

Italia considers as fundamental to maintain high quality standards of its own services and to maximize the satisfaction of the customers. Their internal procedures and the information technologies support these purposes, also through a continuous monitoring of the customers themselves.

✓ **Protection of the underage**

a) Videaset Italia, in recognizing that its artists can also be underage, commits itself to a scrupulous respect (in the primary and secondary norm of the protection of underage), preordering the greater interest of the underage to any other interest. In particular Videaset Italia commits itself to:

- a) refuse the exploitation of the participation of underage to shows and to assure that it always happens with the maximum respect of their person;
- b) to assign to the shows for underage a team purposely prepared and of high-quality.

✓ **Relationship with the members**

The "human factor" is a key resource: it is only thanks to it that we can obtain the maximum satisfaction of the customer. Videaset Italia is, therefore, engaged to select and maintain particularly qualified people. It is brought out through a particular attention to the motivational aspects and to the individual potentialities but also favouring the conditions for a stimulating work environment, which must be rewarding and not conflictual. The staff is employed with a regular contract, as irregular job and exploitation are not tolerated.

Videoset Italia avoids any form of discrimination both while selecting and managing. The professional profiles of the candidates are evaluated exclusively to the pursuit of business interests. During the whole duration of the job relationship the members of Videoset Italia will receive indications to help them to understand the nature of their assignment and to carry it out adequately. In order to guarantee a high professionalism, Videoset Italia commits itself to recognize and to bring out the competences of its own human resources. The employee commits itself to respect, with care and loyalty, the obligation related to its own assignment and is also bound to protect the business goods, through responsible behaviours and according to the operating procedures.

The confidential information related to the members are dealt, according to the regulation of reference, with suitable modalities to assure the maximum transparency for the people involved and the inaccessibility to third parties. Videoset Italia brings out the membership spirit not only during the professional activity, but also with employees' club and through recreational activities to favour the organization of cultural, social and sports initiatives.

✓ **Relationship with contractual partners**

With their collaboration Videoset Italia's contractual partners make possible the concrete daily realization of the activity of the firm. Videoset Italia respects their important contribution, commits itself to deal with them in conditions of parity and mutual respect, and recognizes their legitimate expectation to receive clear instructions about the nature of the assignment and the correct regulations of what due. During the selection of the contractual partners, which is carried

out with clear, sure and not discriminating procedures, the company uses only criteria related to the objective competitiveness of the services and the products offered and to their quality, which is understood also as a correspondence of the supplier to the expressed ethical parameters.

✓ **Budgets**

As it is a limited company, Videaset Italia must follow strict book keeping principles. It must show precise and complete financial statements according to such principles, and must maintain suitable procedures of control in order to guarantee that the accounting and financial report of the company rule of law. The integrity of the budgets of the company is essential for the pursuit of the social scope and is a key factor in order to maintain the confidence and the trust of the employees, of the clients and of all those having cause.

The correctness of bookkeeping and budgets is for Videaset Italia an important engagement since anyone who is interested must have access to complete, precise and punctual information. False, misleading or incomplete information sap the ability of the company to take the right decisions dealing with resources, plans and programs and in some cases give rise to the violation of a law. Anyone who is involved in the drafting of book keeping registries or budgets, will use the due care in order to assure that such registries and prospects are complete, specific and punctual.

✓ **The relationship with public institutions and other external subjects**

The relationships between Videoset Italia and the public institutions are based on the principles of correctness, transparency, collaboration and not interference. Videoset Italia refuses any behaviour that could be interpreted of collusive nature or, however, suitable to compromise those principles. It does not support manifestations or initiatives with an exclusively or mostly exclusive political aim. It abstains from any direct or indirect pressure towards politicians and it does not distribute contributions to trade unions or associations with which there could be a clash of interests

✓ **Relationship with the ambient**

The company employs its own resources in a responsible way and directs its strategic choices dealing with investments and finance in the respect of the ambient and of the public health, aiming at a sustainable development as particularly regards the rights of the future generations.

✓ **Relationship with the press and mass-medias**

Videoset Italia recognizes the fundamental informative role carried out by mass-medias but commits itself to safeguard the integrity of its customers. The company aims at showing the principles of the ethical code and at informing in an adequate way the interlocutors about the engagements and the obligation set up by the code itself. This document, therefore, is common and made known for all those people with whom Videoset Italia gets in contact.

V THE VIOLATION OF THE CODE

The code and its possible future update are defined by the managers of Videaset Italia. It is written in Italian and English and it is published with prominence in the website <http://www.videoset.it>. In case the ethical code is violated, the company can take disciplinary measures towards those responsible of those violations (where necessary for the protection of the business interests and compatibly to what said by the regulation). It can lead to the removal of the responsible ones from the company. Videaset Italia commits itself to take the violation signalling, or those of suspect violation, into consideration only if reliable and reached in a written way and not in an anonymous format, and to provide the analysis of the signalling.

Disciplinary actions

The company will take the opportune actions about the employees, the representative and members whose actions turn out as a violation of the code. The disciplinary actions will be, on the exclusive discretion of the company, an oral or written callback, the suspension or the immediate resolution of the job or business relationship, or any other opportune disciplinary actions, which is considered opportune in those circumstances. A trace of the disciplinary action will be kept in the personal folder of the employee.

In determining which disciplinary action suits according to the case, Videaset Italia will consider all the important information, such as the nature and the seriousness of the violation, possible violations or previous recalls, if

the violation has been intentional or fortuitous and if who did it has denounced or not his/her mistake. Videaset Italia will do its best in order to make the Code respected in a coherent way considering all the relevant information.

Anyone who has committed a presumed violation will be able to ask for a re- examination within 14 days from the notification of the definitive disciplinary decision. If the company has sustained a loss, it will be able to make up for the damage on the responsible natural or juridical persons. Some violations of this code could also be punishable in a civil or penal form by the administrative authorities or other authorities. If a law has been violated, the company will denounce the responsible ones to the competent authorities.

VI THE RESPONSABILITIES OF THE STAFF

- ✓ The staff must read and consider the norms contained in this business ethical code and the norms of reference that regulate the activity carried out within their function;
- ✓ The staff must maintain the standards indicated about their own daily activities and must adhere to all the rules and procedures described in the code.
- ✓ The job and the ethical responsibility of the staff include the collaboration so that this code can be applied. Please help in order to show possible criticality and violations;
- ✓ The staff must cooperate in case of investigations about possible violations of the code and must be sincere and available during the investigations;

✓ In order to start a job relationship the staff will have to sign the contract and will have to respect the contents of the ethical code. Everyone will be, therefore, informed about:

- a) • the characteristics of the function and the duties to carry out;
- b) • the normative and contributively elements dealing with the contract;
- c) • the norms and the procedures in use by Videaset Italia.