

## Ethic Code







## Code of Ethical Behavior

The Code of Ethics adopted by Producteam provides the fundamental guidelines to guarantee ethical conduct at work. It confirms how the company recognizes the importance of ethical, moral and respectful conduct and business among colleagues, customers, suppliers, contractors, consultants and the community in which it operates, all within a framework of absolute transparency.





## CODE OF ETHICS: INTERESTED PARTIES

The Code applies to the Chairman of the Board of Directors, to the members of the Board of Directors, to company management and to all employees of PRODUCTEAM. Furthermore, in all circumstances, Suppliers, Contractors and their staff, as well as Consultants acting in the name and on behalf of PRODUCTEAM are required to act in accordance with the highest standards of business ethics and to ensure compliance with all laws. and the regulations applicable in carrying out its activities.

## CORPORATE POLICY

PRODUCTEAM S.r.l. was born in 2016 and since then has been a reference point for the organization of events, promotional events, concerts, theatrical performances, artistic events in general also for the public, promotional tours, conferences and sporting events. In this context, it works to update, integrate and improve company processes inspired by values of transparency, ethics and absolute respect for rules and regulations.







## RESPECT FIRST OF ALL

PRODUCTEAM believes that, in order to conform to these concepts, the principles of the Code of Conduct must be shared by all personnel who must be fully familiar with these principles. In pursuing its business objectives, PRODUCTEAM places first: Mutual respect between colleagues by encouraging the construction of a motivated and effective team based on teamwork and operating in decent and safe workplaces where diversity and human dignity are valued.

Respect for customers, listening to their suggestions and advice to best meet their needs.

Respect for the community in which the company operates, striving to carry out its activities safely and fully fulfilling legislative and regulatory obligations.





# THE REFERENCE STANDARDS





## 1. ETHICAL AND LEGAL BEHAVIOR

The Chairman of the Board of Directors, the members of the Board of Directors, the management and employees of PRODUCTEAM undertake to respect the law and to adhere to the ethical standards contained in this Code. In carrying out their work, they must be honest and sincere in their dealings with colleagues, customers, suppliers and contractors as well as with public officials with whom they can come into contact. They must in no way tolerate or worse facilitate the illicit behavior of other people.

## 2. ETHICS AND PROFIT

All PRODUCTEAM members must, in any case, ensure that their behavior complies with legal and ethical standards even if these methods could lead to the detriment of the company or short-term profit.

The Company believes that pursuing legality and ethics in the long term can enhance PRODUCTEAM's image and reputation as a serious and reliable company.





### 3. LEGISLATIVE KNOWLEDGE AND REPORTING

PRODUCTEAM managers and employees must be aware, operating the Company on the national and international territory, of the need to know the laws and regulations that are the basis of the organization of any Event. The lack of familiarity with the regulations, whether they are in the field of workplace safety, environmental protection or other, does not provide for an exemption from liability.

In case of doubts or suspicions regarding illegal practices that could involve PRODUCTEAM, the Chairman of the Board of Directors, the members of the Board of Directors and the Supervisory Body must be informed without hesitation.

### 4. THE ROLE OF MANAGERS

It is the responsibility of managers to abide by this Code of Ethics and ensure that all employees comply with it and, where applicable, suppliers, contractors and consultants who work in the name and on behalf of PRODUCTEAM. They must have a strong sense of integrity and behave in an exemplary and honest manner. A transparent conduct, in line with the ethical dictates of this Code, in the workplace favors the loyalty of all members of the Team, from employees, Suppliers, Contractors, Customers, thus establishing a beneficial relationship for PRODUCTEAM and for the communities themselves. in which, from time to time, the Company is called upon to operate.





A large crowd of people at a concert or festival, with many hands raised in the air. Bright stage lights are shining down on the crowd, creating a vibrant atmosphere. The image is dark with a reddish-pink tint.

# AREAS OF INTEREST FOR THE STAFF AND RULES OF CONDUCT





## STAFF ISSUES AND RULES OF CONDUCT

PRODUCTEAM, in compliance with the General Reference Principles, dictates precise Rules of Conduct regarding the following matters:

gifts, generosity and sponsorships.

Health, Safety and Environment.

Equal opportunities and the fight against harassment.

IT resources and their correct use.

Conflict of Interest.

Protection, use of company assets and information.

Preservation and Archiving of documentation.

Human rights.



## 1. DONATIONS, LOBBIES AND SPONSORSHIPS

PRODUCTEAM will not tolerate the offer of gifts and / or donations including any sponsorships in the most varied forms with the aim of influencing other people to guarantee job opportunities or make employment decisions in favor of the company itself. Gifts of various kinds can in fact be confused as an attempt to influence an existing or future business relationship. However, taking into account the main company name of PRODUCTEAM, or the organization of events in general, gifts of a modest nature and in line with the company directive are acceptable. If the gift, offered in the name and on behalf of PRODUCTEAM, exceeds the provisions of the company directives, it is necessary to request specific and justified authorization from the Chairman of the Board of Directors or the Supervisory Body. In any case, any kind of gift must be documented.





## 2. HEALTH, SAFETY AND ENVIRONMENT

PRODUCTEAM considers people to be the Company's most precious resource and, therefore, undertakes to guarantee working conditions that respect individual dignity and to apply current legislation on employment contracts to employees. The Human Resources Guidelines aim to promote correct and respectful behavior for everyone, from management to employees, from Suppliers / Contractors to Consultants. Evaluations of employees, suppliers and contractors are made solely on the basis of the services provided and not on other parameters. For this reason, PRODUCTEAM does not tolerate behavior similar to harassment, intimidation or discrimination of any kind (race, skin color, religion, ethnicity, sex, sexual orientation or other). Unwanted sexual advances in any form, from verbal proposals to physical contact, are also prohibited and prosecuted. PRODUCTEAM considers harassment all those situations that, with words or behavior, end up having a negative impact on the work environment. In the event of inadequate behavior in the workplace, a specific report must be addressed to the Chairman of the Board of Directors and to the Supervisory Body. PRODUCTEAM directives prohibit any form of retaliation against the person making the report.

## 3. EQUAL OPPORTUNITIES AND FIGHT AGAINST HARASSMENT

PRODUCTEAM undertakes to guarantee Health and Safety in the workplace where the term "workplace" refers to both national and foreign locations where Producteam is called to events or other. Likewise, the Company makes every effort to ensure that, in the context of its activities, every precaution is taken to safeguard the environment and prevent all forms of pollution. Ensuring health and safety means that PRODUCTEAM ensures that workplaces are healthy and free from the circulation of alcohol and drugs. Any unlawful, threatening or intimidating conduct, bullying or violence of any kind is also prohibited. All PRODUCTEAM members are responsible for complying with the laws and regulations on Health, Safety at Work and Environmental Protection, in carrying out company activities. Any unsafe working conditions, or potentially illegal situations (including those concerning Customers, Suppliers and / or Contractors), must be immediately reported to the Chairman of the Board of Directors and to the Supervisory Body. PRODUCTEAM encourages Suppliers, Contractors or any other employee of the Company to comply with the regulations on Health, Safety at Work and Environmental Protection.





#### 4. CONFLICT OF INTEREST

PRODUCTEAM respects the right of the parties affected by the Code of Conduct to manage their business or personal investments. However, it is absolutely right that they make every effort to avoid, if only to appear, a conflict of interest situation. A conflict of interest means a situation in which, for example, one of the recipients of this Code of Conduct pursues an interest other than or in conflict with that of PRODUCTEAM or takes advantage of the opportunities offered to him in PRODUCTEAM to gain personal advantage. In particular, by way of example: participation, apparent or carried out in secret, in the activities of Customers, Suppliers or Contractors in a working relationship with PRODUCTEAM. The performance of any type of work activity with Customers, Suppliers or Contractors contrary to the interests of PRODUCTEAM. The use of information acquired for any reason in PRODUCTEAM for carrying out work activities for one's own benefit or for third parties contrary to the interests of PRODUCTEAM.

If the recipient of the Code of Ethics believes that he is in a situation that may appear to be in conflict of interest, he must immediately notify / report everything to the President of the PRODUCTEAM Board of Directors.

#### 5.a PROTECTION, USE OF COMPANY ASSETS AND INFORMATION

PRODUCTEAM guarantees the protection of personal data and information that it comes into possession of as part of the work carried out in compliance with the Privacy Policy. The Company also refrains from seeking personal data and / or information on employees, customers, suppliers, contractors and consultants, by means not provided for by laws and regulations.

The assets owned by PRODUCTEAM available to management and employees must be used exclusively for business and non-personal purposes. However, they can be used for private purposes only with specific authorization from the Chairman of the Board of Directors. Among the most important assets of PRODUCTEAM, since the work carried out is essentially based on the design of projects functional to the organization of events, they must be considered the subject of copyright © and information, of any kind, generated as a result of the work.



## 5.b PROTECTION, USE OF COMPANY ASSETS AND INFORMATION

Examples of confidential information include information, which is not in the public domain, relating to the Company's assets and technologies, profits, business plans and strategies, intellectual property, suppliers or customers. Managers, employees and, where appropriate, any consultants, are therefore required not to disclose confidential information acquired during the period of work at PRODUCTEAM. Particular attention, also due to the prohibition of disclosure of personal data and confidential information relating to PRODUCTEAM, must be paid to the use of social media, internet forums or other forms of communication or publication of an IT nature. If there is a need to speak to a journalist or other media representative about any activity concerning PRODUCTEAM, the only one authorized to make statements is the Chairman of the Board of Directors or a person formally delegated by him.

## 6. I.T. RESOURCES AND THEIR USE

PRODUCTEAM provides personnel with IT resources, including computers, e-mail systems, and other devices to enable each employee to do their jobs properly. However, minimal private use of IT resources in use is acceptable if authorized by top management. In any case, its use is prohibited for illegal purposes such as downloading, copying or sending copyrighted digital material such as music or films.

It is also forbidden to use computers or any other computer resources available to the company to process or send information that is discriminatory or obscene or perceived as harassment, threats or bullying.



A hand is shown in the foreground, pointing towards a complex network diagram. The diagram consists of numerous circular nodes, each containing a stylized human figure, connected by thin white lines. The background is dark blue with a subtle grid pattern. A bright blue arrow points towards the top left of the network.

## 7. PRESERVATION OF THE DOCUMENTATION

To carry out its work, PRODUCTEAM keeps and archives all the documentation produced at the time. The criteria underlying the conservation and archiving of documents processed from time to time are based on the accuracy, completeness and reliability of their registration in order to always allow the reconstruction of the decision-making process and identify the levels of responsibility. It is forbidden to falsify or destroy, if not authorized, any document or company data, existing on paper, tape, disk, video, electronic medium or in any other format. Furthermore, it is forbidden to alter or destroy documents that may be the subject of future complaints, disputes and / or administrative or judicial proceedings.

Two hands are shown holding a small globe of the Earth. The hands are positioned on either side of the globe, with fingers gently gripping it. The background is a dark, textured grey.

## 8. HUMAN RIGHTS

PRODUCTEAM works to ensure that in carrying out its work, human rights are always protected and promoted in all their forms: from the protection of human life in all its forms to the equality of all; from the protection of political rights to security against need. For this reason, in the organization of events by PRODUCTEAM, threatening or violent behavior, discriminatory activities, use of child labor, use of illegal hiring or trafficking in human beings for any purpose will not be tolerated. PRODUCTEAM urges all Suppliers and Contractors acting in the name and on behalf of the Company to respect these very important principles.



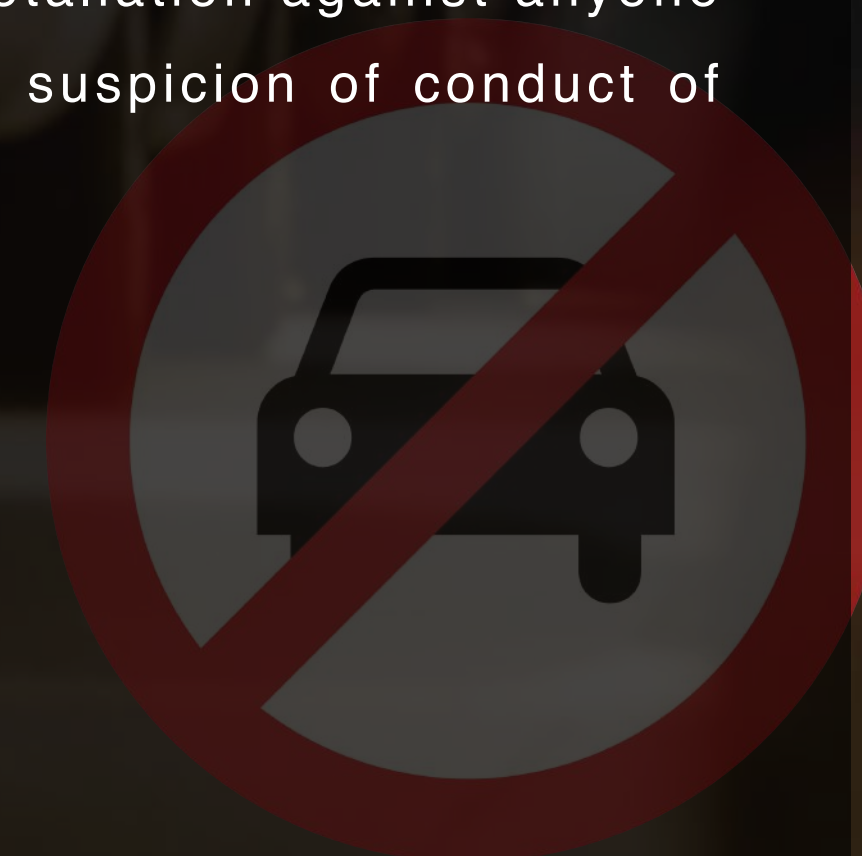
## COMMUNICATION AND TRAINING

The Code of Ethics is brought to the attention of all PRODUCTEAM members through planned communication activities. Specific training activities are organized annually by the Supervisory Body.

As regards the aspects that concern them, in organizing an event on behalf of PRODUCTEAM, the contents of this Code of Conduct will be brought to the attention of the Suppliers, Contractors and Consultants to ensure that they also comply with the rules established therein.

## REPORTING ABUSE

If a member of PRODUCTEAM becomes aware of a violation of this Code or of unethical behavior related to the activities of the Company, he must immediately report it to the Chairman of the Board of Directors and to the Supervisory Body who will start the confidential checks. In line with current legislation, PRODUCTEAM prohibits any form of retaliation against anyone who reports in good faith, conduct or suspicion of conduct of an inappropriate or illegal nature.







# RIGHT

# WRONG

## IMPLEMENTATION OF THE CODE OF ETHICS

PRODUCTEAM is committed to preventing the occurrence of unethical or illegal behavior. Failure to comply with and / or violation of the general principles of the Code of Ethics and of the procedures constitutes a breach of the obligations deriving from the employment relationship and disciplinary offenses. In accordance with the provisions of art. 7 of the Statute of Workers in Italy, the disciplinary system applicable to employees will be brought to the attention of the interested parties through a specific information session. The same applies to the penalties applicable to the directors of the Company on the basis of the provisions of article 6, paragraph 2, lett. e) of the Legislative Decree n. 231/2001 (Italian law). In every contract regarding suppliers, contractors or consultants, the Code of Conduct will be made available and delivered to all subjects who have working relationships on behalf of PRODUCTEAM. For these, the violation of the rules of this Code may therefore constitute a breach of contractual obligations, with all legal consequences, also in relation to the termination of the contract or the assignment and any compensation for damage caused.