

Code of Conduct IFFR

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Purpose of the code

The purpose of this code is to provide a safe and respectful environment for IFFR staff, contractors, volunteers, film professionals, audiences and relations. It applies to anyone working for or visiting IFFR.

We expect all staff, volunteers and contractors to know, apply and adhere to this code of conduct. If there are circumstances where the code cannot be followed, the prevention officer should be notified. The code is published on our website and is reviewed annually by the prevention officer, staff representatives and the Supervisory Board. It is updated if necessary. In the code, 'employee' refers to staff, crew, interns, volunteers and contractors.

All employees are expected to be familiar with the most recent version of the code. By signing their employment contract, volunteer statement or assignment agreement, the employee agrees to the code and is obligated to act in accordance with it.

The code covers the following areas:

- How we treat each other and third parties
- How we address and report undesirable behaviour
- How we handle conflicts of interest
- How we handle information and data
- How we manage work devices and media

We implement the code and adhere to the principles of the Governance Code Cultuur, Fair Practice, and Diversiteit & Inclusie. A supervisor, contact person or HR representative is always available for questions about the content or application of the code.

For whom

Staff, volunteers and contractors ('employees')

The code applies to everyone working for IFFR, including internal staff, interns, volunteers and external employees working under an assignment agreement. The code also applies to employees based outside of the Netherlands. In this document, all these groups are defined as 'employees', and we expect them to respect and comply with the code. The code is in line with Dutch laws and legislation. If an employee has any questions about how the code applies or should be interpreted in relation to Dutch law, they can direct these questions to IFFR's HR department.

IFFR film professionals, audiences, partners and relations

We are committed to providing a safe environment at IFFR for film professionals, audiences, partners and participants. We guarantee freedom of speech and oppose any form of undesirable behaviour. We expect all individuals involved in the festival or its activities to conduct themselves with integrity and respect towards others. Undesirable behaviour will not be tolerated, and IFFR reserves the right to exclude any individual displaying such behaviour from further participation.

1. Manners of conduct; mutual relation(s)

We prioritise inclusivity and aim to create a work environment where safety, dignity and respect come first. Everyone's opinions are valued, and we listen to and respect each other.

We do not tolerate any form of undesirable behaviour, such as bullying, spreading rumours, threats or intimidation – whether physical or verbal. Discrimination based on age, race, religion, gender or sexual orientation is prohibited, and any form of violence or criminal behaviour is unacceptable.

We expect all employees to lead by example and speak up when they see others violating this code. Ensuring a safe workplace is a shared responsibility. If you experience or witness any inappropriate behaviour, unfair treatment or discrimination, report it directly to management, HR or a confidential counselor for immediate action.

We also apply these standards when interacting with external contacts. Employees should always represent IFFR with good manners, respect and integrity. Confidential information must remain private, and offensive or inappropriate language is not acceptable. We make honest, transparent decisions in our work processes. Any violation of this code will be addressed and may lead to consequences.

Undesirable behaviour encompasses, but is not limited to:

• Intimidation:

- Ridiculing or mocking someone in the presence of others;
- Intentionally sabotaging someone's work;
- Commenting in a denigrating manner on someone's gender, age, sexual orientation, ethnic background or religion;
- Putting improper pressure on an employee to do or not do something against their will;
- Starting or spreading rumours about a colleague;
- Any form of bullying, alone or in a group

- **Sexual harassment:**

Sexual harassment of any kind (verbal, physical or online) is illegal, and we will investigate all notifications.

If an employee is found guilty of sexual harassment by an independent investigation, their contract is immediately terminated.

- **Aggressive behaviour:**

Exhibiting verbal or physical aggression is unacceptable. This affects the safe work environment every employee is entitled to. Situations of conflict are dealt with maturely, with an open conversation with room and respect for everyone involved.

- **Abuse of a dominant position:**

Our employees will in no way abuse their position to realise personal or business goals. The (appearance) of abuse of a dominant position arises, amongst other things, when a supervisor manipulates their position to the detriment of an employee. We do not blackmail or manipulate. We are extra careful when we have a dominant position and are aware of the possible ways in which it can be abused.

Relationships on the work floor

Intimate relationships in the workplace are not necessarily a problem, but they can lead to undesirable behaviour such as conflicts of interest, rumours or tensions. A conflict of interest may arise when colleagues are in a relationship because their objectivity can change. Colleagues involved in an intimate relationship should report it to their supervisor or counselor. If needed the supervisor will take appropriate measures in case of:

- a relationship between two employees that work in the same department;
- a relationship between two employees with a hierarchical position; or
- a relationship between two employees who do not work in the same department, but do have a functional work-related relationship.

Measures

If any of the above undesirable behaviours applies, it will be assessed on a case-by-case basis which measures should be taken.

Verbal warning: when we find it necessary to formally give you a warning. It might be a minor violation or your first time.

Official written warning: you will receive an official written warning for any serious breach of the rules. After one official written warning, we will move on to more serious measures like suspension or termination.

Suspension: this happens when you have committed a very serious offense, or when we need time to investigate a case. Your access will be temporarily revoked until it's clear whether and which measures should be taken. You're not allowed to work for third parties during the hours you would normally be working.

Termination: When the violation is very serious. These violations are mostly determined by the law and because of the severity of the act, we can terminate your contract immediately or after an official written warning.

When we apply a measure, which measure we apply, and how long we apply it, always depends on the situation and severity of the violation.

2. Conflict of interest

A conflict of interest can exist when the rights and/or duties of an employee, under its function within IFFR, are in conflict with other interests or ancillary (work) activities. Therefore, we use the following basic principles to distinguish between private interests and the professional interests of IFFR as an organisation.

Ancillary activities and/or positions

We appreciate that employees are actively engaged in society. However, accepting ancillary or side activities cannot conflict, or appear to conflict, with the interests of IFFR. An ancillary position can be paid or unpaid besides a job. Having an ancillary position always needs to be discussed with the employer.

Performing activities for one's own undertaking or legal entity requires written approval from the supervisor. Always discuss the current or future risk of a conflict of interest in (professional) ancillary positions or activities with your supervisor.

For contractors with a similar assignment in the sector, this is more complicated. We expect contractors to take into account possible conflicts of interest, in particular, if they are involved in selection, decision-making, or consultation. IFFR can ask the contractor at all times to sign a statement on conflicting assignments to counteract a conflict of interest. We, in turn, will be aware of the risks of conflicting interests in recruiting and selecting contractors.

Governance and supervision

The Governance Code Cultuur offers a framework for good governance and supervision for cultural organisations. Governance concerns the direction and continuity of organisations and also plays an important role in the trust and legitimacy of organisations in the outside world. Conscious governance is essential to strengthening cultural organisations and ensuring a healthy sector.

The Governance Code Cultuur asks directors and members of the supervisory board to apply several principles:

- Directors and supervisors are independent and act with integrity. They watch out for conflicts of interest, avoid undesired conflicts of interest, and handle conflicting interests in a transparent and diligent manner.
- The board diligently and responsibly handles the means and people of the organisation.

- The supervisory board is responsible for its composition and guarantees expertise, diversity, and independence.

These principles are applied as follows:

- We annually publish (in a report and on the website) the policy, remuneration, results and ancillary positions of the board and supervisors;
- We consult with internal and external stakeholders;
- We annually evaluate the festival;
- We execute a RIE every 3-5 years and review it every 1-2 years.

Notification of integrity

When an employee suspects that the integrity of a colleague, supervisor or contractor is failing, you can confidentially report this to HR, the confidential counsellor or the board of directors. We take action in the following situations:

- Undesirable behaviour;
- Theft or embezzlement;
- Fraud;
- Leaking or abusing information that is marked as confidential, or may reasonably be presumed as confidential, and/or trade secrets;
- Abusing a position; and/or
- Mixing private and corporate interests creating a conflict of interest

3. Information and data

Confidential information

We define confidential information as all information that employees gather when executing their activities. We use GDPR standards in the way we treat confidential information. Information is only exchanged insofar as this is needed for the execution of the activities. Employees are expected to take appropriate measures to prevent confidential information from becoming public by carelessness, sloppiness or indiscrete behaviour.

Besides the code of conduct for handling confidential information, this also applies to the protection of our information and data. Passwords, access keys and the like are personal and need to be handled confidentially.

Privacy

We process personal data confidently and with care. We respect the privacy of those involved (internally and externally) as much as possible. We try to limit the processing of personal data to the absolute minimum. This is always done in accordance with the privacy regulations and can only be done if there is a justification basis ('verwerkingsgrond').

In addition, personal data cannot be processed in a way that is incompatible with the purpose for which these data were obtained. IFFR, as part of their business operations, may

use a 'processor', a third party to whom personal data may be transferred. In those cases, IFFR has an agreement with that third party a processing agreement to secure the guarantees with regard to the processing of the personal data.

Secrecy

Both the employer and assignment agreement contain a provision called 'secrecy and devices'. This provision ties the employer to secrecy and using work devices in the right way.

Working in a transparent way

IFFR applies the Fair Practice Code. For employers, the terms of employment are amplified in the 'terms of employment'; for contractors, they are set out in the 'terms and conditions'. These terms and conditions are an integral part of the assignment agreement.

We are transparent about the results of our company activities and publish these on our website in conformance with the Code Governance Cultuur.

In order to offer transparency in regard to recruitment, all vacancies for the staff composition are published externally.

Data

IFFR processes large amounts of sensitive data. This includes customer addresses, telephone numbers, bank account numbers, financial reports, contracts and other non-public documents which are stored on our servers, shared via email and printed on hardcopy.

If sensitive information is compromised and falls into the wrong hands, it could quickly result in negative consequences. That is why we take measures to protect the organisation against these undesired events. The most recent data and privacy can be found on the internet and intranet.

4. Property and media use

Appliances

We expect our employees to use their computers, laptops, phones and other devices in a professional and discreet manner. The use of their own mobile devices is allowed, if the employer ensures that all usual processes and procedures on data management and information are applied on their devices. Security measures (like passcodes or 2-step verification) should be in place to prevent unauthorised use. These measures cannot be removed from the devices without written consent.

Media

IFFR understands that media attention has a significant influence on our reputation, both externally and internally. The media can play an important role in promoting, supporting or undermining IFFR's reputation. We think it is of utmost importance that the picture that the media paints of us is factually correct. Any sign of misinformation on IFFR can be reported

to the Chief of Audiences & Communities. We expect all employees to be aware of their use of media and behaviour on their personal reputation and the possible effects this could have on working at IFFR.

Alcohol

Because of the nature of the festival and the networking activities, alcohol can be present during the festivities. We ask all our employees to use alcohol responsibly and address irresponsible use of alcohol amongst coworkers. Employees will not, during work or when visiting IFFR festivities, use addictive or narcotic substances (for example, weed, amphetamine or narcotic drugs).

5. Notifications and complaints

We differentiate between an internal and external notification. When undesirable behaviour occurs, or an undesirable situation with a professional relation (a colleague, client or supplier) has arisen, there are several ways to report or discuss it confidentially. We have internal and external confidential counsellors for this purpose.

When suspecting or experiencing undesirable behaviour, you can directly contact the persons involved to solve the problem. This tactic is suitable for cases of light intimidation (e.g. inappropriate jokes amongst colleagues).

When in doubt, inform HR, a confidential counsellor, your supervisor, or relevant external party, to discuss it in case of grave undesirable behaviour (e.g. discrimination). HR, confidential counsellors and/or supervisors are obliged to treat these notifications confidentially.

Counsellors

The internal and external counsellors offer guidance and support to employees and anyone else who has a complaint about undesirable behaviour. These complaints could refer to an unreasonable workload, bullying, situations of sexual harassment, intimidation, aggression, violence and any form of criminal behaviour.

The counsellors can offer a sympathetic ear, but can also advise in taking further action. The counsellors work in a more informal manner than the complaints committee. The problem might be solved with a few conversations (without any report).

Next to the internal counsellors, IFFR uses the external platform Moresonline.nl as a central hotline for undesirable behaviour of the performance, film and television sector.

Website: <https://mores.online/>

Other numbers for urgent matters:

- In case of an emergency, immediately dial 1-1-2
- Or reach out to Slachtofferhulp Nederland through +31 900 0101

The (independent) complaints committee that IFFR preferably hires will address the complaint in a more formal manner and will investigate to see if the complaint is justified. IFFR's board of directors decides how they will act upon the advice of the complaints committee. The complaints committee will check if the measures taken have helped to end the complaint(s).