

Code of Conduct IFFR

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Purpose of the code

The purpose of this code is to offer IFFR staff, contractors, volunteers, film professionals, audiences and relations a safe and respectful environment, whether it is whilst working for, or visiting, IFFR.

We expect staff, volunteers and contractors to know, apply and put into practice this code of conduct. If the code cannot be put into practice under certain circumstances, the prevention officer is notified. The code is published on our website. The code is annually addressed by the prevention officer and evaluated at the staff representatives meeting and Supervisory Board, and updated if needed. In the code 'employee' means staff, volunteers and contractors.

We expect all employees to be familiar with the most recent version of the code. By signing their employment contract, volunteer statement or assignment agreement, the employee agrees with the code and is bound to act in accordance with it.

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Starting points and layout of the code:

- How we treat each other and third parties;
- How we treat undesirable behaviour;
- How we treat a conflict of interest;
- How we treat information and data;
- How we deal with appliances and media; and
- How we report undesirable behaviour.

We put into practice the code and the principles of the Governance Code Cultuur, Fair Practice en Diversiteit & Inclusie. A supervisor, contact person or HR person is always available for questions regarding the content or application of the code.

For whom

Staff, volunteers and contractors ('employees')

The code applies to all persons working for IFFR. This goes for both internal staff, volunteers and external employees working under an assignment agreement. This document defines these groups as 'employees'. The code falls within the boundaries of Dutch laws and legislation. The code also applies to employees based outside of the Netherlands. We expect those employees to respect and comply with the code. The employee can direct any questions regarding the application or interpretation of the code (to Dutch law) to the HR manager.

IFFR film professionals, audience, partners and relations

We want to offer IFFR film professionals, audience, partners and relations a safe environment where freedom of speech is guaranteed and undesirable behaviour is opposed. We expect

everyone participating in the festival or one of its activities to behave with integrity and respect for each other. We do not tolerate undesirable behaviour and IFFR retains the right to exclude any person displaying such behaviour from further participation.

1. Manners of conduct; mutual relation(s)

We greatly value inclusivity. We strive to offer a working environment where safety, dignity and respect are of the utmost importance and where we listen to and respect each other's opinion.

Undesirable behaviour, including threats and physical or verbal intimidation, is unacceptable. Discrimination based on age, race, religion, gender or sexual orientation is not allowed. We expect employees to set the example and address colleagues who don't follow the code. Unfair treatment, discrimination or undesirable behaviour is to be directly reported to the management or HR, so they can address it.

We treat others in the same way we treat colleagues; the rules in the code take a central position in this. We expect employees to always behave as an ambassador to IFFR. Good manners, respect and integrity are of utmost importance. Confidential information is not shared with other parties. We don't accept insulting or inappropriate language, and we act with integrity by making choices in our work processes. Anyone behaving in an undesirable manner will be addressed, and this might have consequences.

Undesirable behaviour encompasses, but is not limited to:

- **Intimidation:**
 - Willingly sabotaging someone's work;
 - Commenting in a denigrating manner on someone's ethnic background or religion;
 - Solely or in a group putting improper pressure on an employee to do something or to not do something (against their will);
 - Starting or spreading rumours about someone's personal life;
 - Ridiculing or mocking someone in the presence of others or choosing them to perform non-work-related tasks against their will.
- **Sexual harassment**
 - Sexual harassment is illegal, and we will investigate all relevant notifications. If an employee is found guilty of sexual harassment by an independent investigation, his or her contract is immediately terminated.
- **Aggressive behaviour**
 - Exhibiting physical or verbal 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 his or her 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 on the work floor are not undesirable, but can produce undesirable behaviour, like rumours, tensions or conflicts of interest. A conflict of interest can arise in the case of a workplace relationship because objectivity can become compromised. Colleagues with an intimate relationship have to report this to their supervisor or counsellor. A supervisor will take 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.

If one of these situations applies, it will be assessed on a case-by-case basis which measures should be taken. This can either be a transfer to another department, a change of tasks or a tailor-made agreement.

2. Conflict of interest

A conflict of interest can exist when the rights and/or duties of an employee has, under its function within IFFR, conflict with other interests or ancillary activities. Therefore, we use the following basic principles, for which we make a distinction between private interests and the professional interests of IFFR as the 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 requires written approval from 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 of (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 carry out a self-evaluation;
- We annually execute an RIE.

Notification of integrity

When an employee suspects that the integrity of a colleague, supervisor or contractor is failing, you can anonymously report this to HR, the counselor 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.

3. Information and data

Confidential information

We define confidential information as all information with which employees gather when executing their activities. We have created a code of conduct that defines the manner in which 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 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 confidentiality and with care. We respect the privacy of those involved as much as possible. We try to limit the processing of personal data to the absolute minimum. This is always done in conformity 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 appliances'. This provision ties the employer to secrecy and using appliances 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 and bank account numbers and 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 appliances in a professional and discreet manner. The use of their own mobile appliances is allowed, if the employer ensures that all usual processes and procedures on data management and information are applied on their devices. The devices should have security measures in place, like passcodes, 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 and cause damage. 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 head of the Marketing and Communications department. 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 anonymously. We have internal and external counsellors for this purpose.

When suspecting 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 suspecting or when in doubt, inform HR, your supervisor, or client, or you can discuss it in case of grave undesirable behaviour (e.g. discrimination). HR and/or supervisor is obliged to treat these notifications confidentially.

In addition, in any case, IFFR has counsellors available, both internally and externally.

Counsellors

IFFR uses the external hotline Moresonline.nl as a central hotline for undesirable behavior of the performance, film and television sector. Website: <https://mores.online/>

The external counsellors offer guidance and support to employees and anyone else who has a complaint about undesirable behaviour. These complaints can consist of a situation of sexual harassment, bullying, aggression, violence or an (unreasonable) workload. The counsellor can offer a sympathetic ear, but can also advise taking further action and if needed, mediation to solve a conflict. The counsellor works in a more informal manner than the complaints committee. The problem might be solved with a few conversations (without any report).

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).