

**CODE**

# **OF CONDUCT**

**THE GUIDE FOR  
THE RIGHT DECISIONS**



# INTRODUCTION



## MESSAGE FROM THE CEO ARTHUR DE BOK

At Stage Entertainment, we touch the lives of millions around the world with our creativity, hospitality and inspiring productions. We are proud to be a leading creative production company that values and imbeds integrity, respect and honesty in our daily operations.

To ensure that we have the continued trust of one another, our customers, our business partners and our visitors, we need to live our company's principles as described in this Code of Conduct. We have created this code to make explicit the professional and ethical behaviour expected from all of us and those we do business with.

Our vision is to strive for excellence and always exceed our audiences' expectations with our shows, venues and creative development. To achieve this, we combine artistic and creative excellence with sound commercial expertise. Our brand values (outlined on page 7) are about delivering top quality to our audiences, being a leading company, demonstrating entrepreneurial spirit, acting smart and being open minded.

To continue our successful engagement in the world and to make a difference, we must uphold our core values and maintain our excellent reputation. It's a reputation I'm fantastically proud of – and I'm sure you are too. The diverse global stage on which we work is thrilling, but complex, and at times ambiguous. This Code of Conduct aims to be a guide for us all. In addition to the more obvious legal and compliance obligations, your daily activities, language and personal behaviour also have considerable impact on our integrity and reputation. We have therefore endeavoured to incorporate all of these aspects in this code.

One of our greatest assets at Stage Entertainment is our reputation. We're known and respected for our integrity and high ethical standards wherever we do business. Our success as a company is highly dependent on our employees' continuous commitment to doing the right thing and speaking up whenever they see or suspect someone violating our guiding principles. We know it takes many years and much hard work to earn a good reputation, but it can all be destroyed in an instant by carelessness or misconduct. Therefore, we should be aware of the collective responsibility we bear in this respect.

We all have the right and responsibility to protect our company from improper conduct that threatens our operations, reputation and future growth. I trust you find the principles outlined in this document useful. If you would like additional information or have any questions, please ask your line manager or HR representative.

Arthur de Bok  
CEO Stage Entertainment

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# OUR CODE OF CONDUCT



## OUR CODE OF CONDUCT

The Code of Conduct describes Stage Entertainment’s integrity principles in four areas:

1. Business with integrity
2. Commitment to customers
3. Responsible employer
4. Ethical and diligent employees

Every person who works at the Stage Entertainment group of companies or acts on behalf of the companies is expected to adhere to the principles described in the Code of Conduct. This includes permanent employees, temporary employees and contractors working internally and externally.

As an employee, contractor or agent of Stage Entertainment, you are obliged to:

- Act with integrity and care;
- Comply with all applicable laws and regulations;
- Be familiar with and adhere to Stage Entertainment policies and standards;
- Share concerns about any conduct that violates Stage Entertainment policies and standards.

All references to ‘We’ in this document refer to employees, contractors and agents of Stage Entertainment. All references to ‘Company’ in this document refer to Stage Entertainment.

The code is intended to provide guidance in how to act ethically in all situations related to our business activities. If you have any questions or seek clarity, please consult your line manager or HR representative.



# OUR MISSION AND VALUES



## OUR MISSION AND VALUES

### MISSION

Live entertainment satisfies a fundamental human need for shared, unique, live experiences. At Stage Entertainment we proudly carry on the tradition of creating live theatrical events as we bring excellence in entertainment to all our productions worldwide. Our aim is to Make Moments Magical and to exceed the expectations of our audiences with our shows, theatres and creativity.

### OUR VALUES

We deliver top quality in every aspect of the live entertainment experience we present to our audiences.

We are a leading company in all our territories, setting the tone for theatre management and presenting high-quality shows. We are aware of our responsibilities as market leader.

We are entrepreneurial; we always look for new opportunities with our theatres, content and organizational effectiveness.

We want to think and act in a smart and intelligent way, always challenging organizational effectiveness, understanding the dynamics of the market and improving our local and global partnerships.

We are proud to be open-minded, not only towards colleagues within our group of companies but also regarding new business opportunities. We have an open mind when it comes to changes in the market and in our cross-border collaborations with different countries with different cultural backgrounds where mutual respect and trust are key.



# BUSINESS

# WITH INTEGRITY





## BUSINESS WITH INTEGRITY

### **Compliance with laws**

We comply with the laws and regulations in every country in which we operate.

### **Fair competition**

We support free and open competition. We make our business decisions free from arrangements with competitors or suppliers that restrict competition, such as arrangements on pricing, rebates, quantities, clients or suppliers, explicit or implied. We follow arm's length principles when doing transactions with related parties.

### **Intellectual property**

We request proper permission to use, copy or distribute the rights of legally protected works of others.

### **Preventing corruption**

We do business honestly, without engaging in corrupt practices such as bribery, kickbacks or other wrongdoing, directly or via third parties.

This means, for example, that we do not give, solicit or receive anything of value for the purpose of encouraging improper activities or gaining improper advantage.

### **Contributions and donations**

We do not make contributions or donations to political parties, political organizations or individual politicians. We do not use company time, property, equipment or funds to conduct or promote personal political activities.

### **Reputable business partners**

We work with reputable business partners. We expect our business partners to adhere to similar ethical and integrity principles.

### **Books and records**

Our books and records are true and fair and in accordance with good business practices, applicable local and international accounting standards and laws.

### **Corporate responsibility**

We are committed to the community and to the careful use of environmental resources. We support various good-citizenship initiatives aimed at improving quality of life. We invest in environmentally friendly technical solutions and actively comply with environmental regulations.

# COMMITMENT

# TO CUSTOMERS



## COMMITMENT TO CUSTOMERS

### Productions

We aim to be open minded and reflect a breadth and diversity of opinions in our productions. We are sensitive to social and cultural traditions in individual countries.

### Hospitality

We strive to ensure that every visitor is warmly welcomed and receives the highest level of service and live entertainment. We value our customers' opinions, and we invite them to share their experiences. Our customers' experience is our key deliverable.

### Safety and security

We are committed to ensuring that our visitors are safe and secure. In all our operations, we adhere to safety and security standards in accordance with regulations and internal policies.

### Customer choice

We strive to offer tickets to our shows in a wide variety of seat and price categories and in a wide variety of offline and online sales channels, allowing our theatre visitors to choose the options that best fit their personal preferences.

### Promotion

In promotion and sales, we are honest and keep the promises we make.

### Protecting personal information

We respect and protect the confidentiality of information entrusted to us. We control and process information in accordance with applicable laws.



# RESPONSIBLE EMPLOYER



## RESPONSIBLE EMPLOYER

### Health and safety

We aim to provide a safe and healthy work environment to prevent accidents and injury. We look after the physical and emotional wellbeing of employees and staff at all our locations.

### Respect

We aim to provide a work environment free of sexual harassment, intimidation, and hostile or offensive behaviour—verbal or physical. We do not tolerate such behaviour and strive to create a workplace based on mutual respect and understanding.

### Minors

We look after and protect the physical and emotional wellbeing of minors who participate in our shows. At all Stage Entertainment locations, we strive to provide safe environments for minors that meet the highest standards.

### Diversity and inclusion

We provide equal opportunities for all employees and those applying for employment. We embrace our cultural diversity and see this as a strength of our organization. We respect one another and do not discriminate because of race, gender, age, sexual orientation, religion or socio-economic status. We strive for an inclusive environment.

### Professional development

We nurture talent in all areas of our business. We work towards developing human potential by enabling our employees to expand their capabilities, knowledge and skills through on the job experience and training.

### Fair reward

We recognize our employees' contributions to the company through fair financial compensation, professional attention and respect.



# ETHICAL AND DILIGENT EMPLOYEES



## ETHICAL AND DILIGENT EMPLOYEES

### Health and safety

We follow safety and security standards in accordance with internal policies and regulations. We act with care and use good judgment to prevent accidents and injuries. We do not use and are never under the influence of alcohol, drugs or any other intoxicating substances during working hours, on-call or standby duty. We inform our line manager if use of medications might impact work safety.

### Dignity and respect

We respect human rights, cultural diversity and differences of opinion. We strongly condemn and do not tolerate discrimination, intimidation, sexual harassment or violence in the workplace.

### Using and protecting company assets

We use company assets and resources responsibly and with care, and safeguard them against theft, loss, waste or abuse. Company assets are for business purposes only; they are not to be used for personal benefit unless specifically allowed.

### Using and protecting information

Information is an asset, and we protect the confidentiality of company information. We access and share it only for business needs or legal reasons. We do not use company information for private benefit. We do not access, process or store company data on private devices (e.g. private tablet) or via private applications (e.g. private email), unless explicitly allowed.

### Personal information

We respect and protect the confidentiality of personal information of colleagues and business partners, such as contact information, health information, photos, employment performance and compensation. We access or share personal information only for business needs or legal reasons.

### Communication with third parties

Only authorized individuals are allowed to communicate with the public, media, authorities, analysts or other third parties on behalf of Stage Entertainment about matters concerning Stage Entertainment. We always refer inquiries by third parties

or authorities to authorized individuals. Social media involves communicating with the public; therefore, only authorized individuals can communicate on behalf of Stage Entertainment via social media.

### Conflict of interest

We avoid situations of perceived or actual conflict of interest by referring the situation to a line manager prior to taking any decision. Conflict of interest is a situation in which personal interests or relationships could interfere with one's obligation to act in the best interest of the company. This includes transactions with related parties or decisions which might benefit related parties. Related parties are partners, family members, friends and other persons and entities with whom we have personal or financial interests. We are conscious and transparent about close, non-professional relationships.

### Pressure

If we feel that tasks or goals create pressure that could lead to a breach of principles of corporate conduct, we always discuss the situation with our line manager or HR manager.

## ETHICAL AND DILIGENT EMPLOYEES

### Outside employment and other activities

Outside employment and other activities should not conflict with our duties and responsibilities, nor should they conflict with the Company's interests. We ask the Company for prior approval of any (potentially) conflicting personal activities.

### Gifts, favours and hospitality

We do not give or accept gifts, favours or hospitality if they could create a sense of obligation, compromise professional judgment or give the appearance of doing so. We are transparent about giving and accepting gifts and hospitality by disclosing these to our line manager. For giving or accepting gifts or hospitality exceeding the amount 100 EUR per person we obtain approval from the CEO. We never give or accept money.

### Business travel and events

We travel to and participate in business events only for legitimate business purposes and only when relevant for our work activities or role. We incur only necessary costs and we choose reasonable transport, lodging and other expenses (in accordance with the applicable travel policy).

### Visiting performances

We use tickets for performances only for professional and business relationship purposes. We obtain tickets in a transparent manner by disclosing the purpose and invited visitors. In case of previews and opening nights, company management will communicate internal invitations to persons who have appropriate reasons to attend the event.

### Internal policies

Internal policies are in the best interest of everyone. We know and understand the policies and follow them to help ensure safety, security and quality.





# ADHERING TO THE CODE OF CONDUCT AND OTHER COMPANY POLICIES



## ADHERING TO THE CODE OF CONDUCT AND OTHER COMPANY POLICIES

Stage Entertainment employees know and understand the Code of Conduct and other company policies and adhere to them when performing their work duties. The Code of Conduct must be read in conjunction with related company policies that provide more detail on certain matters. We treat breaches of policies or misconduct as serious disciplinary issues for which individuals will be held accountable. Measures include reprimand, suspension, dismissal and/or legal action.

If you observe or suspect a breach of the Code of Conduct, you can report the concern via the Expolink Integrity Hotline.

You will not be criticized or penalized for speaking up in good faith. The Company views reprisals or victimization against anyone reporting suspicions of wrongdoing as a serious disciplinary matter.

### You can report a concern via the Expolink Integrity Hotline:



#### By phone:

800 920 034, access code: 78243



#### By website:

<https://wrs.expolink.co.uk/stage-entertainment>



#### By smartphone application:

SpeakingUp,  
access code: stage-entertainment

If your concern is about **infringement of the Organizational Model 231**, you can report it also to the program Supervisory Board directly by sending e-mail to the address [paologiacomo.colombo@odcecmilano.it](mailto:paologiacomo.colombo@odcecmilano.it)

*For additional information, please refer to our Speak Up Policy.*



## CODE OF CONDUCT

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