

ASSOCIAZIONE LINGOTTO *M*MUSICA

Code of Ethics

Approved on July 1, 2011

Table of contents

1.	MISSION OF ASSOCIAZIONE LINGOTTO MUSICA	3
2.	PURPOSE AND SCOPE	3
3.	PERFORMANCE AND CONTROL.....	3
4.	PENALTIES	4
5.	CONDUCT PRINCIPLES IN THE MANAGEMENT OF THE ASSOCIAZIONE.....	4
5.1.	CONFORMITY WITH THE LAW.....	4
5.2.	TRANSPARENCY AND FAIRNESS OF INFORMATION.....	4
5.3.	MANAGEMENT OF CASH FLOWS, CASH AND CREDIT CARDS	5
5.4.	SAFEGUARD OF HUMAN DIGNITY.....	5
5.5.	PRIVACY AND DATA PROTECTION.....	5
5.6.	COPYRIGHT AND INTELLECTUAL PROPERTY PROTECTION.....	5
5.7.	CONDUCT PRINCIPLES WITH REGARD TO MINORS	6
5.8.	EQUITY, IMPARTIALITY AND NON DISCRIMINATION.....	6
5.9.	GIFTS AND PRESENTS.....	6
5.10.	CONFLICTS OF INTEREST	6
5.11.	HEALTH AND SAFETY	7
6.	RELATIONSHIPS WITH SUPPLIERS, EMPLOYEES, SUPPORTERS AND USERS OF THE ASSOCIAZIONE SERVICES.....	7
6.1.	RELATIONSHIPS WITH HUMAN RESOURCES (EMPLOYEES, COOPERATORS AND PROFESSIONALS).....	7
6.2.	RELATIONSHIPS WITH THE PUBLIC.....	7
6.3.	RELATIONSHIPS WITH SUPPLIERS, CONSULTANTS AND ARTISTS.....	8
6.4.	RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION	8
6.5.	RELATIONSHIPS WITH FINANCING INSTITUTIONS AND SPONSORS.....	8
6.6.	RELATIONSHIPS WITH THE MEDIA.....	9

1. Mission of Associazione Lingotto Musica

Associazione Lingotto Musica (hereafter, in short, the “Associazione”), was founded in 1997. It is a non-profit organization and performs specific promotion and spreading activities of musical culture, promoting and/or organizing music events.

2. Purpose and scope

The Associazione, with this Code of Ethics (hereafter, in short, also the “Code”), intends to define the set of overall values and principles of behaviour and conduct, relevant for the purposes of a good operation, reliability, compliance with the law and with regulations, as well as the reputation of the Associazione.

The Code is addressed to: members of management and control boards, employees, cooperators, suppliers of professional services, musicians and artists, partners, sponsors, communities and the media, and, in general, all those who operate in the name and/or on behalf of the Associazione for all purposes without distinctions and exceptions (the so-called “Addressees of the Code” or, more simply, the “Addressees”).

The Addressees are personally responsible for the application of this Code. Once informed, the addressees cannot be justified for their non compliance as a result of the lack of knowledge of the Code or of having received instructions in contrast by any reference or hierarchical level of the Associazione.

The Code was approved by the Institution Management Board on 1 July 2011, and forms an integral part of the Model of organization and management required by art. 6 of Legislative Decree 231/2001 on the subject of “The rules governing the administrative responsibility of legal entities”.

3. Performance and control

The Associazione is committed to communicate the Code through appropriate information and training activities. All the entities concerned, can consult this Code of Ethics on the site www.lingottomusica.it.

Presumed violations to the Code can be reported to the Supervisory Board using the following reference dlgs231@lingottomusica.it, which will evaluate reports with a commitment to confidentiality and to protect the identity of the reporting entity, except as otherwise required by the law.

Reports filed in good faith will not involve negative repercussions for the reporting individual also when they result unfounded. It is however guaranteed that the reporting individuals will not be subjected to retorts, discriminations or penalties.

4. Penalties

The compliance with the Code of Ethics is an integral part of the terms governing the employment relationships of Associazione Lingotto Musica, and any violation to the Code perpetrated by employees, involves the adoption of disciplinary measures commensurate with the severity or repetitiveness of the misdeed or the severity of fault, in compliance with the requirements of the applicable national labour contracts (in Italy, the rules as of art.7 of Law no.300 dated 20 May 1970).

As far as the other addressees of the Code are concerned, the violation of the provisions of this Code involves the adoption of measures commensurate with the severity or repetitiveness of the misdeed or the severity of fault, up to the termination of existing contracts in force and possible request for damages.

5. Conduct principles in the management of the Associazione

The Addressees to this Code of Ethics are required to adopt a conduct inspired by fairness, impartiality, diligence as well as personal correctness, avoiding all the abuses of the position held with the purpose of achieving unfair advantages for oneself or for others.

5.1. Conformity with the law

The essential principle of the Associazione is the compliance with existing legislation and regulations in the place and time where it operates; the Associazione does not intend to undertake or maintain relationships with entities not complying with such principle. The Associazione does not justify under any circumstances the violation to this essential principle, not even when this is justified by pursuing an interest or an advantage.

5.2. Transparency and fairness of information

The Associazione is committed to have all transactions and operations correctly recorded, authorized, verifiable, legitimate and that the decision-making, authorization and performance process can be verified. Each transaction should be adequately supported by documentation in order to be able, at any time, to carry out controls assessing the characteristics and reasons for the transaction, identifying the person responsible for authorizing, performing, recording and verifying the transaction.

All Addressees should ensure the utmost truthfulness, transparency and completeness of information, both oral and written documents (paper and digital), produced within the performance of operations, each with regard to his/her own capacity and responsibility.

In particular, all the individuals taking part to the preparation of the financial statements, of the reports and of corporate communications, are required to keep a conduct based on the

principles of correctness, transparency, cooperation and compliance with the law and existing regulations, in order to always deliver true and correct information.

5.3. Management of cash flows, cash and credit cards

The Associazione is against all forms of activities connected with perpetrating offences of counterfeited currency and public credit cards, performing the necessary controls to verify cash and electronic money earned in the course of the transactions taking place at its ticket offices.

The Associazione is aware of the implications of managing cash and cash flows with regard to the anti-money laundering regulations and requires the utmost diligence and care for cash management process.

5.4. Safeguard of human dignity

The Associazione guarantees the safeguard of dignity in all its forms, through appropriate and adequate measures to safeguard the individual personality.

5.5. Privacy and data protection

The Associazione guarantees the treatment of personal and sensitive information in compliance with existing legislation requirements. For this purpose the Associazione appoints professionals experienced in implementing measures appropriate to safeguard data and their correct treatment.

The Associazione asks all Addressees not to alter and/or change in any way the operation of an information system or to interfere, without right and in any form on data, information or programs included in such systems or in third parties' information systems.

5.6. Copyright and intellectual property protection

In its operations, the Associazione respects copyright and intellectual property rights. The Associazione complies with existing regulations on the subject of copyright protection, preparing appropriate documentation on time and recognizing the relevant fee to the Italian Authors' and Publishers' Association (SIAE - *Società Italiana degli Autori ed Editori*).

Know-how protected by copyright, both owned by the Associazione and by third parties, cannot be reproduced without requesting the necessary authorizations.

The Associazione requests all Addressees not to use in any way and for any purpose, know-how and/or material protected by copyrights and/or other rights as well as any intellectual and/or industrial property rights, without the consent of the owners of the rights and/or of those who are the legitimate users.

5.7. Conduct principles with regard to minors

The Associazione requires the utmost commitment of all Addressees of this Code of Ethics, in carrying out all the necessary actions in order to preserve the psychological and physical health of minors, also with the purpose of preventing deviancies, abuse and commercial exploitation.

The Associazione performs specific music culture promotion and spreading activities aiming at promoting young artists, in compliance with the rules of correctness and morality. The Associazione does not tolerate any form of abuse both physical and psychological on minors.

5.8. Equity, impartiality and no discrimination

In the performance of its operations, the Associazione avoids all discriminations based on age, sex, sexuality, health, race, nationality, political and religious views regarding its stakeholders.

5.9. Gifts and presents

The Associazione utilizes complimentary tickets to attend musical events as a means to promote music culture in the territory.

The Associazione is however aware of the management of such means, and is committed to use it in a consistent and appropriate manner.

In particular, in business relationships with third parties, it is forbidden to receive or to give benefits (both direct and indirect), gifts, acts of politeness and hospitality, having such a nature and value as to be interpreted as aiming at obtaining special consideration and however not in line with the ordinary business politeness.

It is crucially important for the Director, or the Statutory Auditors or the employee receiving gifts beyond the ordinary politeness relationships, for the purposes of benefiting in the performance of operations, to immediately notify the Management Board, the Board of Statutory Auditors or, for employees, the superior who will immediately report the matter to the relevant boards and/or to the appropriate corporate department, who, after adequate verifications, will inform the author of the gift, present, etc. of the corporate policy on the subject.

At the time of music events, the Associazione can offer complimentary tickets to attend such events, in compliance with the rules illustrated above and however not serving to obtain undue favours and benefits.

5.10. Conflicts of interest

Situations where the individuals involved are or could just appear in conflict of interest should always be avoided in the performance of all activities, meaning the case when the

Addressee pursues an interest differing from the Associazione mission, or gains personal advantage from business opportunities and activities.

Should situations of conflict of interest arise, also potential, involving the Addressees, immediate notice should be given to the Supervisory Board, avoiding all conducts which might be considered as falling under a conflict of interest situation.

5.11. Health and safety

The Associazione is committed to comply with existing regulations on the subject of health and safety as well as with all updates, with reference to the requirements provided for in Legislative Decree no.81 dated 2008 as subsequently amended, and other specific regulations on the subject.

In addition, the Associazione is committed to spread and consolidate a culture of safety, developing risks awareness, and operating in order to preserve health and safety of employees and cooperators, adopting pre-emptive measures, in compliance with the existing regulations on the subject.

6. Relationships with suppliers, employees, supporters and users of the Associazione services

6.1. Relationships with human resources (employees, cooperators and professionals)

The Associazione acknowledges the professionalism, skill and reliability of the Human Resources (meaning employees, cooperators and professionals rendering services for the benefit of the Associazione with contracts other than employment contracts) as basic factors.

The Associazione supports equality and equal opportunities principles in the selection and hiring of employees, cooperators and professionals, rejecting all discriminations or otherwise Italian and foreign pressure.

Artists, in particular, are selected on the basis of professionalism, experience and technical skill in line with the necessary profiles to realize music events, and with the requirements of the reference public.

6.2. Relationships with the public

The Associazione is intended to organize music events suitable to all public and to promote creative artists and performers.

The Associazione aims at spreading musical culture among the public of all age and status. For this purpose, the Associazione despite being committed to guarantee impartiality to the members of the audience and a consistent performance of service for everybody, reserves the right to grant tickets/subscriptions at reduced prices, to encourage attendance of particular ranges of audience (special offers for young students, etc.).

6.3. Relationships with suppliers, consultants and artists

The Associazione operates in the processes for the identification and selection of suppliers of goods and/or services, in accordance with objective criteria of competitiveness and quality supported by evidence, in line with the principles of this Code of Ethics.

The Associazione organizes concerts selecting artists and orchestras also at an international level, on the basis of the criteria of professionalism, technical and artistic skill of performance and experience, requesting the compliance with health and safety standards, as far as their responsibility is concerned.

6.4. Relationships with the public administration

With regard to the relationships with the public administration, the Associazione operates in accordance with correctness and transparency principles, in order to guarantee fair conducts that cannot be interpreted as ambiguous or in contrast with existing regulations by the individuals involved.

Relationships with the public administration should only be managed by the employees and cooperators appointed for the purpose.

For this purpose, the Associazione asks the Addresses who interact with the public administration, to pay particular attention to the risks of such relationships. Under the circumstances, the Associazione asks to take special care and pay attention to the compliance with the process for the management of collections and payments to and from the public administration, in access to information systems of the public administration and in the management of relationships with them.

6.5. Relationships with financing institutions and sponsors

The Associazione uses income from sponsorships and grants to promote the knowledge of music. In its relationships with financing institutions and with sponsors, the Associazione bases its conduct on the principles of transparency and correctness.

The Associazione reserves the right to evaluate in advance the possible sponsor or financing institutions, and is committed to manage funds made available by them in full compliance with the purpose of the Associazione.

Resources collected through sponsorships or grants are utilized in accordance with effectiveness and efficiency criteria, guaranteeing appropriate information on the use of resources received to the financing institution.

The public administration is an important stakeholder for the promotion of musical culture in the territory, and, under the specific circumstances, the individuals in charge of relationships in the name and on behalf of the Associazione, shall act in full correctness and compliance with the reference regulations.

6.6. Relationships with the media

The Associazione acknowledges that the media have a significant role in the promotion of the cultural activity of the Associazione and is committed to constantly inform all the reference contacts.