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DOCUMENT DETAILS

Document	Code of Ethics
Description	Code of Ethics
Start Date	11 October, 2023
Collecting Society	AGEDI
Purpose	Establishing ethical principles upon which the operation of the association is based.
Classification	INTERNAL DOCUMENT
Author	Ribas y Asociados

Version	Date	Author	Action performed
01	11/10/23	Ribas y Asociados	

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INTRODUCTION

This document summarises ethical principles upon which AGEDI's activity is based. It contains a description of those behaviours that must be promoted and those that must be avoided within its music producers' intellectual property rights collective management activity, derived from the use or exploitation that companies from different sectors make of national and international phonograms and music videos, among which are to be highlighted: the public communication, its reproduction exclusively for direct or indirect public communication and the private copying equitable remuneration. Likewise, the association develops promotional and assistant activities in benefit of its members.

The Code of Ethics constitutes the top-level regulatory tool within the regulatory structure of the organisation. Its principles are developed in policies, rules, and proceedings. It represents the commitment of the association with the compliance of laws and ethical values defended within.

In AGEDI, the real and effective application of these principles will be cared for, so that this self-regulatory system gets to remove any act that could endanger the values and legal assets to be protected. Failure to comply with this code shall constitute a labour infringement, which will be punishable accordingly.

Bearing in mind the connexion of ethical principles with behaviours that are deemed an offence in the Criminal Code, and that the main obstacle for the efficiency of the Code of Ethics is the tolerance for non-compliance, it is established in the association a criterion of zero tolerance and maximum collaboration is requested informing the Ethical Channel about any risk situation detected.

This Code of Ethics must be accepted by any person joining AGEDI's organisational structure as a requirement prior to hiring; this applies also to the members of the Board of Directors and the Internal Control Body. It contains a penalty system, applicable if an infringement of ethical principles contained within occurred.

The scope of application of the Code of Ethics shall spread to providers, external professionals, and representatives of the association to whom shall be requested, as far as possible, its acceptance or that of their own Code of Ethics, in which equivalent infringement ethical principles and a prevention policy is defended.

The Code of Ethics shall be informed and disseminated to AGEDI members for their knowledge.

The association shall make efforts to, progressively, include in all the association's contracts a clause enforcing the other party to comply with the law and the ethical principles of AGEDI's Code of Ethics or their own, with equivalent content. The other party shall also have to apply a similar prevention and monitoring policy that allows to monitor and audit our association. The failure to comply with these obligations shall equate to a serious breach of the contract.

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01 SCOPE OF APPLICATION

- 0101 Corporate Scope. - this Code of Ethics is applicable in AGEDI.
- 0102 Personal Scope. - This Code of Ethics is applicable to employees, management positions and AGEDI staff entirely, as well as to external members of the entity conforming the Board of Director and the Internal Control Body.
- 0103 Relational scope. - The scope of application of this Code of Ethics shall extend, as far as possible, to providers, as well as to those foreign associations which have signed reciprocal agreements for the exchange of producers' rights. To the extent possible, contracting shall be limited to companies with similar policies or otherwise behavioural patterns, preventive measures and monitoring systems shall be imposed by contract that avoid behaviours contrary to the principles contained in this Code of Ethics.
- 0104 Geographical Scope. - This policy shall apply to activities developed by AGEDI in any geographical scope, either local or international.
- 0105 Although the Code of Ethics shall not be applicable to the General Assembly conformed by all members of AGEDI, they will be advised of its content with informative purposes.

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02 INDUSTRIAL AND INTELLECTUAL PROPERTY

- 0201 AGEDI bases its policy on the absolute respect for intellectual property rights and the prosecution of their infringements, and this policy shall also be promoted in the reciprocal agreements signed with foreign associations.
- 0202 The association boosts the defence of intellectual property rights in its members' music sphere, producers of phonogram and music videos for which it commits with actions and fight against piracy and collaborates with the State Enforcement Agencies as well as promoting social awareness regarding different legislation intellectual property protected assets.
- 0203 The association, within its piracy enforcement, works for the strengthening of intellectual property laws in defence of its members and the respect for their rights, collaborating with different collectives and initiatives to protect and promote music production.
- 0204 Without duly prior and written authorisation, it shall not be permitted the copy or reproduction, totally or partially, of third parties' immaterial assets, nor the public communication, making available, transform or total or partial modification, import or distribution of such assets.
- 0205 There will be included in the category of copyright protected assets the books, videos, musical works, phonograms, typographies, advertising campaigns, slogans, brochures, catalogues, writings, speeches, presentations, reports, studies, drawings, graphics, paintings, comics, projects, plans, maps, models, architecture or engineering designs, computer software and any other protected work, even if the copyright sign is not showing.
- 0206 Special attention shall be given to contents and pieces of software downloaded from the Internet, which should have the duly licence from intellectual property rights owner, even if they have been obtained from Internet browsers such as Google. All pieces of software installed in the association computers and mobile devices shall have the relevant user licence.
- 0207 The same protection shall be given to trade marks, patents, industrial designs, domain names and other immaterial assets protected by industrial property.

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03 COMPUTER SECURITY

0301 AGEDI shall ensure the prevention and monitoring of infringements that can be committed using information technologies.

0302 Among such infringements, which constitute acts forbidden by the association, are to be highlighted the following:

1. Unauthorised access to computer systems of either public or private third parties, members or any other association.
2. Dissemination of virus or software that can cause damage to material or immaterial assets.
3. Denial-of-service attack.
4. Manipulation of electronic auctions.
5. Any other computer damage, including sabotage or the simple alteration of data or information contained in an external computer system.
6. Electronic scams, including phishing, pharming and any other type of scam based on the use of information technologies or social engineering.
7. Dissemination of rumours, criticisms and boycotts on the Internet and social media, including re tweets and forwarding of messages of any type.
8. The realisation of deceptive advertising campaigns and promotions.
9. Infringing Intellectual and Industrial Property of technological assets.
10. Industrial espionage on the Internet.
11. Disclosure and unveiling of industrial secrets obtained on the Internet.
12. Unauthorised release of databases.
13. Unauthorised acquisition or release of reserved personal data.
14. The investigation of persons on social media violating their intimacy.
15. The register of domains using external brands and social denominations.
16. Money laundering through self-consume or electronic transactions.
17. Child pornography.

0303 The association defends the responsible use of telematic and electronic means.

0304 The association shall have a regulation that rules in detail the use of corporative TIC resources by employees, both internal and external, in what is applicable.

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04 CORRUPTION

- 0401 AGEDI bases its relations with the public and private sectors, at both national and international level, on the principles of transparency and equality, and discards any action aimed at achieving an advantage in front of other associations or third parties, in the market or in public or private contracts based on illicit acts.
- 0402 Consequently, it may not favour nor be offered public positions or employees or managing positions of private companies with money, presents or any other economic or patrimonial benefit aimed at obtaining any type of advantage in favour of the association.
- 0403 The actions of the association have as objective, among others, the collective management of intellectual property rights corresponding to music producers for the use or exploitation that third companies make of thousands of phonograms and music videos.
- 0404 AGEDI shall have an anti-corruption policy and a regulation that rules the travel and representation expenses.
- 0405 It shall be considered influence peddling any act or strategy that aims at directing or influence the action of a public servant or authority taking advantage of any situation derived from his/her personal relationship with them or with any other public servant or authority to achieve a resolution that can generate directly or indirectly an economic benefit or avoid a loss of any type for the association of for a third party.
- 0406 Any activity that could be influence peddling shall not be carried out, and, in particular, the activities listed below:
1. Directly influencing a public servant or authority.
 2. Indirectly influencing accepting the offering of a third party.
 3. Influencing through third party services.
- 0407 AGEDI shall be able to have relationship with political parties in the framework of that established in the Spanish legal system, as well as in the signatory countries of reciprocal agreements with this entity, complying at any time with the national laws in matter of political parties funding.
- 0408 No donations to political parties or foundations linked to them are allowed.
- 0409 AGEDI shall apply a protocol to verify the real destination of funds before making a donation to a NGO or to participate in a sponsorship, patronage or any other social, cultural, scientific, charitable, sportive or similar project.
- 0410 It shall be considered a conflict of interest that situation in which an action or decision can be influenced by a particular interest of a person or persons of the association that take part in it, or of third parties which they have a personal link with.
- 0411 There shall exist in AGEDI the obligation of avoiding conflict of interests.
- 0412 In the case of actions of introduction, establishment or relationship in foreign countries, it is not permitted to make payments or presents to public servants of such countries with the aim of facilitating an administrative formality, obtaining a permit, a favour or any other kind of service.

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05 MARKET AND CONSUMERS

0501 AGEDI bases its activity on the principle of transparency, and discards any action aimed at achieving a benefit, advantage or unfair or illegitimate advantage in front of members, providers and rest of actors of the sector.

0502 AGEDI commits to publish and make accessible the relevant information of the association to interest groups, correct and truthful information, both in cases when it is voluntarily transmitted and when it must be done because of a legal obligation.

0503 AGEDI commits to promote equitable access to market of all its members.

0504 Consequently, there shall not be considered ethical, and therefore shall be forbidden the following acts or behaviours:

1. Unauthorised access to other companies or associations confidential information.
2. Industrial espionage.
3. Disclosure of entrepreneurial secrets.
4. Use of internal or external privileged information for any type of transaction or business.
5. False advertising.
6. Frauds, swindles and scams of any type.
7. Dissemination of false rumours about products, services, market conditions, etc.
8. Tampering to alter the price of third parties' products.
9. Tampering to alter the stock market or value of a company.
10. Manipulating public competitions.
11. Falsification of payment methods.
12. Tampering to lead the association to insolvency to defraud creditors and/or members.
13. Blocking or not carrying out an informative transparency policy regarding the activities and the evolution of the music production industry
14. Taking advantage of business opportunities known by reason of its condition as association or its position.

0505 Regarding these activities, special attention shall be given to the following, not permitted behaviours:

1. Accessing details, products' technical information or entrepreneurial strategies of associations or companies through a provider in common, a relative or a trusted contact, or from a research that goes beyond the information that can be deemed publicly accessible.
2. Making false references or promises to a member or group of interest or any third parties which has relation with on the properties or features of a product or service owned or by third parties.
3. Distort economic of financial information about the association and particularly the annual accounts, as well as management costs passed on to members.
4. Disseminate rumours on social media, mass media or directly to members, about a third party, their products and services or about any other association.
5. Taking advantage of reserved information accessed by reason of the position held or of the work performed in the association to transfer it to third parties, sell it or use it to acquire or sale stock shares or any other transaction or business.

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6. Carrying out any type of unfair action that places the association in situation of patrimonial advantage or a position not admitted legally.
7. Altering the information provided to its members or to the market in general both in the publication of official charts, reports or any other content published.

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06 TAXES AND SOCIAL SECURITY

- 0601 AGEDI shall comply in a timely manner with its obligations in taxes and Social Security matters.
- 0602 AGEDI's accountancy shall faithfully reflect its economic situation, including all receipt and payments made. No operation aimed at hiding receipts shall be admitted.
- 0603 In AGEDI attention shall be paid to any member or provider trying to use the association's structure for a money laundering operation. Any suspicion of a risk situation in the matter shall have to be communicated immediately to the Ethical Channel.
- 0604 Likewise, there shall be communicated any transaction or payment to a company or organisation that could be related to financing terrorist activities.
- 0605 In payments made by AGEDI the use of cash shall be limited.
- 0606 Where the use of cash is necessary, a detailed record of payments made with this method shall be kept. In such record, the amount paid, concept, date of payment and recipient shall be specified.
- 0607 Under no circumstances, payments shall be made to physical or legal entities other than those showing in one invoice.
- 0608 Under no circumstances, payments shall be received to physical or legal entities other than those showing in one invoice.

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07 RIGHT TO PRIVACY

- 0701 AGEDI shall respect and protect privacy of persons that, due to its relationship with the association, provide personal details or reserved nature information.
- 0702 This protection shall extent to members, workers and partners to the association and shall apply from the design stage to any new service being developed.
- 0703 On AGEDI website there shall be privacy policy and cookies policy, which will inform visitors regarding the reach and purpose of the data treatment made.
- 0704 The association shall monitor the channels through which personal data are obtained and shall ensure that all necessary requirements are fulfilled to comply with the applicable regulations.
- 0705 Data shall be retained with the corresponding security measures according to their nature.
- 0706 Reviews and inspections derived from the application of the offence prevention and monitoring model and of this Code of Ethics shall be done following a protocol that guarantees respect to privacy and dignity of people involved.
- 0707 The performance assessment carried out and any communication made to the Ethical Channel shall be protected by a secrecy obligation of people managing them.
- 0708 The association, in all cases where personal data are treated whether to have been collected or registered shall do so in accordance with that established in legislation in force and mainly in that refers to the creation of automated files, the treatment of the information they contain, their dissemination or communications and the confidentiality.

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08 LABOUR RIGHTS

- 0801 In no case shall be imposed by AGEDI labour or Social Security conditions that harm, suppress or limit the rights that workers have acknowledged by legal provisions, collective agreements or individual contracts.
- 0802 Neither shall workers be hired without communicating the register with the relevant Social Security regime.
- 0803 Regarding foreign workers, no hiring shall be done without having obtained the relevant employment permit. No placement or contract simulation techniques shall be applied in any case.
- 0804 In personnel selection processes a methodology shall be used that guarantees the veracity of work offers and in no case shall be offered misleading or false working conditions.
- 0805 Likewise, the intimacy and dignity of applicants to a working position shall be guaranteed in research of references offered directly or through social networks and former employers, as well as in the data treatment referred to the curriculum.
- 0806 AGEDI shall respect trade-union freedom and the rights to strike of workers.
- 0807 In the case of contracting with foreign providers, the association shall ensure that none of them has child exploitation cases.



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09 RIGHT TO EQUALITY

0901 Working relations in AGEDI are based on the principles of mutual respect and equality.

0902 It shall not be admitted any kind of discrimination against any person by reason of their ideology, religion or beliefs, ethnic origin, race or nation, genre, sexual orientation, familiar situation, illness, or disability, for holding the legal or trade-union representation of workers, by reason of family ties with other association's workers or by using any of the Spanish State official languages.

0903 AGEDI shall ensure this principle is respected.

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10 SAFETY AT WORK


- 1001 All the works to be developed in AGEDI must comply with the security conditions required by occupational risks prevention regulation.
- 1002 The association shall be obliged to establish the security measures required by law, and the worker is obliged to obey them. It is forbidden to removal or neutralisation of any security or ergonomic measure implemented at the working place.
- 1003 Policies, rules, and proceedings, where appropriate, shall include the monitoring obligations and the responsibilities of each working position in this matter.

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11 ENVIRONMENT, COLLECTIVE SECURITY AND PUBLIC HEALTH

- 1101 AGEDI shall perform its activities always taking into account the preservation of the natural environment, the minimum consumption of resources and the control of the environmental impact.
- 1102 In case of developing projects that could involve an environmental risk, a previous impact assessment shall be carried out on the matter.
- 1103 Regarding whatever waste generated, such as paper or similar, AGEDI shall establish adequate checks and measures for their treatment and recycling with the purpose of avoiding any other environmental threat.
- 1104 The rational use of resources, respect for the environment and sustainability shall be ensured.
- 1105 Checks shall be established on any activity or product that can directly or indirectly create a risk for collective security and public health because of toxicity of components or any other threat to persons.

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12 URBAN PLANNING

- 1201 In the case of AGEDI carrying out real property transactions and construction, building and urbanisation initiatives, it shall respect the local, regional and national urban planning and regulation.
- 1202 The association shall not perform unauthorised works of urbanisation, construction or building on grounds intended for roads, green areas, public domain goods or places which have a legally or administratively acknowledged landscape, ecological, artistic, historical or cultural value, or have been considered to be of special protection for the same reasons.
- 1203 AGEDI shall neither promote the rezoning of land nor the modification of planning instruments, urbanisation projects, parcelling, re-parcelling, construction or building or granting of licenses against spatial planning and urban regulations in force.

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13 MONITORING AND PREVENTION MODEL

- 1301 AGEDI shall have a Monitoring and Prevention Policy in which it shall be described a monitoring and prevention model aimed at avoiding the commission of infringements in the association.
- 1302 Such policy shall contain a description of key elements, either human, organisational and documentaries, that AGEDI applies to avoid law infringements to happen, and in particular acts that can be deemed offences by the Criminal Code.
- 1303 AGEDI shall ensure the real and effective application of Monitoring and prevention measures foreseen by such policy, so that this self-regulation system achieves the removal of behaviours that can endanger its reputation in the market and the material and immaterial assets of the association.
- 1304 This policy shall be adapted to the jurisprudential trends and the amendments to the Criminal Code regarding the charging criteria and the monitoring and prevention requirements demanded in matter of criminal liability.

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14 ETHICAL CHANNEL AND RISKS COMMUNICATION

- 1401 The employees, managing positions and all AGEDI staff have the obligation to inform about risk situations that can happen within and out the association related directly or indirectly to AGEDI's own activity, which can cause damages to any natural or legal person.
- 1402 There shall also be informed the situations of breach of law, the Code of Ethics or the ruling developing it.
- 1403 AGEDI shall have an Ethical Channel to which communications shall be addressed alerting on the existence of a risk or non-compliance situation, as well as any other improvement proposal of the monitoring and prevention model.
- 1404 The communications of the Ethical Channel shall be made through electronic email to the following address:

Communication channel	Contact details
Email	Email address: canaletico@agedi.es

- 1405 The Ethical and Compliance Committee shall be responsible for managing the Ethical Channel and to attend the communications sent to it. In any case, the Ethical and Compliance Committee shall be able to outsource the management of the Ethical Channel to a specialised company or office.
- 1406 The communications carried out through the Ethical Channel shall be protected with strict confidentiality.

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15 PENALTIES AND PENALTY SYSTEM

- 1501 The non-compliance with law, the Code of Ethics and the regulation developing it shall constitute an infringement which level and sanction shall be carried out according to that provided for in the Collective Agreement to which AGEDI belongs.
- 1502 The penalty system to apply shall also be that mentioned in the Collective Agreement and, failing this, that usually followed by the Administration Area.
- 1503 The penalty system shall launch from a report, a communication, as a result of an inquiry or in any other form that allows the knowledge of the alleged infringement by the worker.
- 1504 The inquiry protocol of the alleged infringement shall be that established in the Monitoring and Prevention Policy of the association and shall be confidential.

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16 UPDATES AND IMPROVEMENTS

- 1601 This Code of Ethics shall be periodically updated with the aim of including the improvements considered appropriate to define the ideal behaviour to be developed in AGEDI.
- 1602 The Compliance and Code of Ethics shall perform the constant verification of the Code of Ethics and the monitoring and prevention model, which shall propose the appropriate modifications in the following circumstances:
1. When relevant infringements to the Code of Ethics or to the regulation body developing it become evident.
 2. When significant changes occur in the association or in the activity developed by it.
 3. When changes in the control structure of the association occur.
- 1603 The Compliance and Code of Ethics shall apply the protocol established in the Monitoring and Prevention Policy ANNEX to investigate any incident or relative non-compliance of the Code of Ethics and of the monitoring and prevention model brought to its attention.
- 1604 In case that the investigation of a risk allows to identify an area for potential improvement, the Compliance and Code of Ethics shall issue the corresponding improvement proposal, which shall be sent to the relevant department, determining a responsible and a deadline to undertake the monitoring of its application.