



*Trusted  
Supplier Code  
of Conduct*



# **Why do we need a Code of Conduct?**

## **A Message from our President**

*Premiere is approaching an exciting time as we are adding to our American-based business through global expansion and international operations; yet, it would be shortsighted to expect that this type of growth will be free from challenges.*

*Premiere remains committed to the heart of our business – our Team Members and their families – and is equipped to face any changes with preparedness and guidance. Premiere is duly dedicated to being a good corporate citizen by working ethically and respectfully with our partners in the communities in which we conduct business.*

*For our Team Members and our partners, there may be uncertainty surrounding specific situations or even dilemmas on how we should behave inside or outside of the United States. Premiere leadership understands that ethical questions and answers are not always clear-cut. Our “Trusted Supplier Code of Conduct” coupled with our “Core Values & Global Code of Ethics” (the “Codes”) should serve as a preliminary guide to aid in navigating challenging situations.*

*These Codes are intended to support Premiere’s Core Values and to help our Team Members and our partners live these Values while working around the world. Similarly, we want to reiterate the high standards that we hold for ourselves and our partners and the ethical conduct we expect at Premiere. Anyone doing business with Premiere, regardless of position or affiliation, is bound by these Codes and is expected to follow them.*

*Prior to conducting business with or on behalf of Premiere, you are expected to read and understand the Codes. Premiere holds its Team Members and partners individually responsible for following these guidelines and any corresponding policies and procedures that go along with these documents. Should you have questions regarding the Codes or any other policy or procedure, contact information has been provided within the body of the documents so that no question goes unanswered.*

*As we move toward a more globalized Premiere, we must continue to hold ourselves and our partners responsible for behaving ethically and acting within the local and international laws of the countries in which we operate. Individual and joint accountability is imperative for a successful and profitable future for all of us.*

*Kyle Mowbray*

*President, Premiere Inc.*



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## **Table of Contents**

- 01** *Premiere's Trusted Supplier Code of Conduct: An Introduction*
- 02** *Taking Joint Responsibility for Our Actions*
- 03** *Abiding by the Law: Local, Federal and International*
- 04** *Responsibility to Our Business Partners*
- 05** *Reporting an Issue*

## Premiere's Trusted Supplier Code of Conduct: An Introduction



**O**ur relationships with our suppliers, customers, contractors, partners, agents and other third-parties are fundamental in conducting business in a successful and ethically responsible manner. Coupled with our Core Values & Global Code of Ethics, the Trusted Supplier Code of Conduct encourages those who work with us to adhere to fair business practices and enjoy Premiere's successes that come from conducting ourselves in a lawful manner.

### WHO IS A TRUSTED SUPPLIER?

In this Code, "Trusted Supplier" is defined as any individual, organization, company or entity that provides, or wants to provide, goods or services to Premiere or its Team Members. The term also refers to any employee, third-party agent, temporary worker, sales representative or contractor that works on behalf of an individual, organization, company or entity as described above.

*Premiere is committed to living our Core Values and we have adopted a Global Code of Ethics & Conduct for our Team Members, Officers and Directors that provides guiding principles for who we are as a company and how we perform for our customers.*

*Based on the standards set for us in our Global Code of Ethics & Conduct, our Trusted Supplier Code of Conduct outlines our expectations that we have for ethical conduct and transparent dealing with our third-party partners.*

### CODE COMPLIANCE

All Trusted Suppliers and partners that work with Premiere are expected to read, understand and apply the guidelines set forth in this Code. Premiere also expects that all Trusted Suppliers working with Premiere Team Members are aware of how detrimental even the appearance of improper conduct is to good business.

Premiere Trusted Suppliers are expected to follow the same protocols as Team Members and are not allowed to circumvent this Code under any circumstances. All violations, or potential violations, are to be reported to Director of Human Resources by calling **+001 (713) 524-2240**. (See **Section 5: Reporting an Issue** for more information).

Any Trusted Supplier found to be in violation of this Code will no longer be able to work with Premiere and will be removed from our approved Trusted Supplier list.

We hold ourselves and our partners accountable and we believe that by encouraging a joint responsibility to act ethically, we will all be stronger and more transparent global business citizens and partners.

## Taking Joint Responsibility for Our Actions

Premiere expects that its Team Members and partners conduct themselves in a respectful manner toward one another and to those with whom we do business. Premiere is committed to understanding and celebrating the diversity in backgrounds, talents and skills within and outside of our organization and we believe that mutual respect is imperative to our success. Trusted Suppliers are tasked with behaving in an inclusive and fair manner at all times.

### QUALITY, HEALTH AND PROTECTING THE ENVIRONMENT (QHS&E)

From its inception, Premiere has always maintained strong Quality, Health, Safety, and Environment (QHSE) practices. Not only does Premiere protect the physical health of its Team Members partners and Trusted Suppliers, but we are committed to a mentality of safety first. Similarly, as we expand our global footprint, Team Members and our Trusted Suppliers are expected to recognize and respect the local communities in which we work.

Trusted Suppliers are expected to follow Premiere's proactive stance on creating a safe, healthy and environmentally sound atmosphere

***Just like Premiere Team Members, if a Trusted Supplier observes a hazardous situation, you are required to stop the job and ensure the safety of everyone.***

for all people. Just like Premiere Team Members, our partners are responsible for following all local, federal and international laws governing environmental, safety and health concerns. If you are approached or asked to violate any laws around these subjects, you are required to immediately report such instances to the Director of Compliance by calling **+001 (713) 524-2240**.

Trusted Suppliers are responsible for taking adequate precautions and should plan ahead regarding all QHSE issues. If a problem arises, you are held accountable for adequate and timely reporting. Trusted Suppliers must promptly alert the Premiere Director of Compliance and take immediate action in response to any near miss, injury, accident, hazardous condition or any potential environmental threat.

### DEMONSTRATING INTEGRITY & RESPECT

Trusted Suppliers must be committed to and promote a diverse and inclusive workplace and may not engage in discrimination in matters involving recruiting, employing, training, promoting, compensating or any other term or condition of employment on the basis of the following:

- *Race, color, ethnicity, or national origin*
- *Gender or identity*
- *Sexual orientation*
- *Age*
- *Religion*
- *Disability*
- *Veteran or Armed Forces Status*
- *Any other legally protected status*

Harassment and violence have no place within our organization or outside of Premiere premises. Premiere has a **ZERO TOLERANCE** policy for any type of harassment and you are required to abide by and enforce this policy in connection with Premiere-related activities. Premiere also prohibits violence in the workplace and the possession of firearms, explosives and any other type of weapon or ammunition on Premiere premises.

### DRUGS AND ALCOHOL

Premiere maintains high industry standards by employing a **ZERO TOLERANCE** policy regarding alcohol, controlled substances and legal or illegal drugs in the workplace and on the job. No one, under any circumstances, is allowed to enter Premiere, customer, contractor, partner, vendor or agent facilities to conduct Premiere business or operate equipment while under the influence or in possession of alcohol, controlled substances, legal or illegal drugs.

### ACTING ON BEHALF OF PREMIERE

Trusted Suppliers are not allowed to represent Premiere in any media forum without prior written approval from Executive Management or the Director of Sales and Legal.

## Abiding by the Law: Local, Federal and International

**P**remiere Trusted Suppliers will always be held responsible for conducting themselves in an ethical manner that falls within the bounds of US local, federal or international laws in effect in the countries in which they operate. Premiere Team Members and partners are required to perform business activities in a transparent, truthful and direct way at all times, especially when dealing with regulatory and governmental agencies.

### ANTI-BRIBERY AND ANTI-CORRUPTION

Trusted Suppliers may **NEVER** make, accept or offer any form of improper payment while conducting business on behalf of Premiere and must always abide by all international and US laws, regulations, acts and treaties that forbid bribing government officials, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.



Trusted Suppliers are prohibited from offering, attempting to offer, authorizing or promising any type of bribe or “kickback” to a government official or private sector individual for the purpose of obtaining or retaining business or unfair advantage. Trusted Suppliers are prohibited from soliciting or accepting a bribe or “kickback” and are not allowed to hire a third-party to engage in any illegal or unethical practices to circumvent the law or this Code.

### ANTI-TRUST LAWS

Premiere operates in many countries that have strict antitrust laws that mandate free trade and fair competition. Trusted Suppliers working on behalf of Premiere are accountable for knowing and understanding these laws and abiding by them.

### TRADE LAWS

Premiere delivers tools, equipment and services internationally; therefore, you are required to carefully comply with all national and international that regulate cross border imports, exports or re-exports.

Trusted Suppliers may never override US imposed sanctions or embargoes that limit or prohibit transactions with specific countries, certain individuals or entities and for certain end-goals (e.g., aiding in the creation of chemical or nuclear weapons). Trusted Suppliers are also banned from participating in any trade boycott that is not backed by the United States.

### TRANSPARENCY & MAINTENANCE OF ACCOUNTING RECORDS

All accounting and financial transactions related to business with Premiere must be reported in an accurate, fair and transparent manner. Trusted Suppliers are expected to keep detailed books, records, accounts, supporting schedules, invoices, and financial statements related to Premiere in conformance with Generally Accepted Accounting Principles (GAAP). You must conform to any legal requirements stated in your contract with Premiere and employ a strong system of internal controls.

Trusted Suppliers are required to give Premiere audit rights to their books and records for transactions with Premiere, its subsidiaries and affiliates, and make such documentation available to Premiere Team Members or qualified third-parties (e.g. accountants or consultants).

Additionally, it is expected that Trusted Suppliers comply with all regulatory and legal requirements related to the creation, retention and disposal of financial records. You must also comply with any internal requests for records and must cooperate with any audit, investigation or pending lawsuit that would require document production.

## ***POLITICAL ACTIVITIES***

Trusted Suppliers are not allowed to use any Premiere funds, resources or assets to engage in political campaigning, or for any other purpose without written consent from Executive Management. Trusted Suppliers are also prohibited from offering gifts on behalf of Premiere to any candidate running for public office or currently serving in public office within or outside the United States.

Equally, Trusted Suppliers are not allowed to act as representatives or state opinions on behalf of Premiere nor are you allowed to provide incentives or engage any third-party to make contracts with any federal, state or local government official or their cohorts, to influence policy, legislation or any other official legal action.

## ***CHARITABLE CONTRIBUTIONS***

Trusted Suppliers may not promise any charitable gifts or contributions on behalf of Premiere or use your relationship with Premiere to aggressively solicit Premiere Team Members or other partners of Premiere to donate to or join a non-profit organization that you are promoting.

## ***GIFTS***

Trusted Suppliers should note that Premiere Team Members are not allowed to give, receive or solicit gifts, payments or other benefits to influence any business decision in fact or appearance. Trusted Suppliers are highly discouraged from offering any gifts at all and absolutely prohibited from giving a gift or other benefit that is more than nominal in value (USD \$ 50 in the United States; USD \$40 in Latin America) to a Premiere Team Member more than one time per calendar year. Even gifts of nominal value are prohibited if their purpose is to influence decisions of Premiere Team Members to take or refrain from taking action that would benefit the Trusted Supplier. Cash or cash equivalent hand-outs (i.e., gift cards) are not allowed under Premiere policy.



## ***ENTERTAINMENT***

Premiere Team Members are not allowed to be entertained in a way that would cause them to feel obligated or swayed to make a business decision, in fact or appearance. Trusted Suppliers or partners are allowed to entertain Premiere Team Members only under the following circumstances:

- A legitimate business discussion ensues
- The entertainment setting is business appropriate and allows for discussions to take place
- The outing or event is reasonably priced and nominal in value (maximum of USD \$100 per person in the United States or any lower limit specified by Premiere location)
- The desire to be entertained (i.e. requesting tickets to a sports game) was not sought by a Premiere Team Member

## Responsibility to Our Business Partners

### FAIR DEALING

**O**ur partners are required to deal in a just manner with our Team Members, customers, contractors, competitors, partners and anyone else with which Premiere does business. Trusted Suppliers cannot take advantage of any person via exploitation tactics, being deceitful, abusing power, dispersing privileged information, misrepresenting themselves or our business together or using any other fraudulent or unfair practices.



### CONFIDENTIALITY AND PROPRIETARY INFORMATION

To keep confidential information confidential, Trusted Suppliers are responsible for protecting Premiere's trade secrets and proprietary information just as if they were employed by Premiere. You are prohibited from using, sharing, copying, or removing Premiere proprietary information or personal data from Premiere premises without prior written approval from the Director of Sales and Legal or Executive Management.

Confidential information includes any Premiere data that outlines any internal financial or accounting information, patented or undisclosed technology or tool drawings, business plans, activities and strategies or any other information that Premiere has not yet released to the general public.

Similarly, everyone must follow the laws that manage the collection, usage and disposal of personal data such as salary and benefit information and any other confidential information related to Premiere Team Members, customers, contractors, competitors, partners, suppliers and anyone else with whom Premiere does business. All proprietary and personal information must be returned to Premiere upon the completion of a project or the end of a relationship with Premiere, whichever occurs first.

### PROTECTING PREMIERE PROPERTY

Trusted Suppliers are tasked with protecting Premiere tangible and intangible assets. Asset usage should be limited to Premiere business purposes only. Physical property such as automobiles, lay down trucks, district buildings, shop parts, tools, etc. should be handled with the utmost care to prevent loss, damage or theft. You, just like Team Members, are responsible for reporting to the Director of Compliance any defect in or missing tangible property as well as the spread of any confidential information.

### **INSIDER TRADING**

If a Trusted Supplier discovers or hears of any non-public information about any company, you are expected to keep this information to yourself and are forbidden to buy or sell any of that company's securities or options, if publically available. You are instructed to avoid even the appearance of improperly using insider information for any type of benefit or gain.

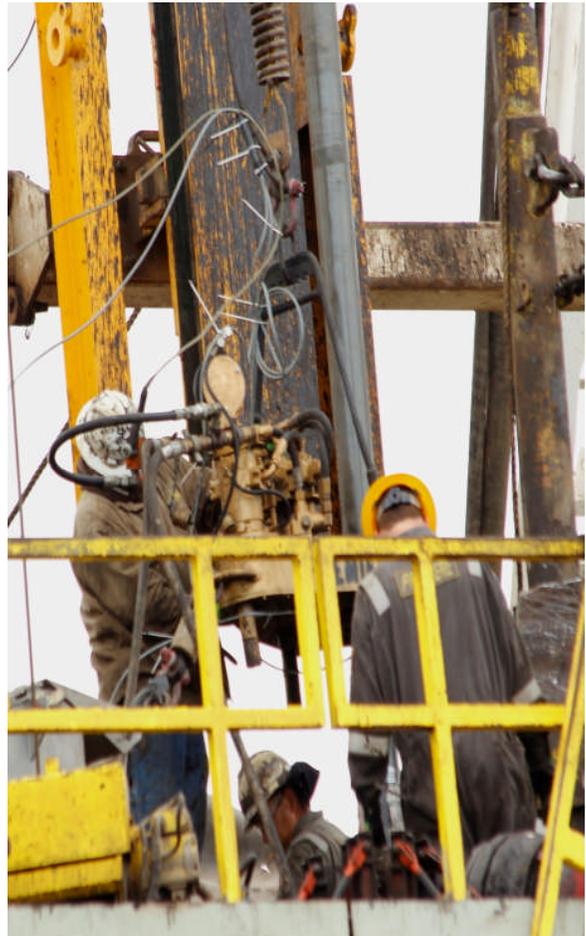
Insider information can include knowledge about large contracts, impending or settled litigation, insurance claims, merger and acquisition decisions, business activities and financial budgets, among other bits of information.

### **CONFLICTS OF INTEREST**

Trusted Suppliers must avoid conflicts of interest, in appearance or fact, when conducting business with or on behalf of Premiere and its partners, subsidiaries and affiliates. Conflicts of interest can arise when a Trusted Supplier has personal, familial, monetary, political or other interests that interfere with Premiere's interests. For instance:

- A Trusted Supplier has familial ties with a Premiere Team Member in an Executive Position.
- A Trusted Supplier gains information from their relationship with Premiere and benefits from that information (e.g. financial investment or business opportunity); and
- A Trusted Supplier uses Premiere property for individual benefit or gain.

Trusted Suppliers are expected to put Premiere and its interests at the forefront of their business activities when engaged with Premiere. Trusted Suppliers and their family members are prohibited from accepting any improper personal benefits as a result of your relationship with Premiere.



## Reporting an Issue

**W**hile working on behalf of Premiere, Trusted Suppliers may be faced with ethical dilemmas or other concerns. Trusted Suppliers are urged to use common sense and sound judgment and to avail themselves of the internal and external resources provided to them by Premiere, to enable them to address unforeseen issues.

You are required to promptly report any concerns involving Premiere, regardless of whether the concern involves you, and must take reasonable and practical action and cooperate in any Premiere investigation, as necessary.

To report questionable behavior or a possible violation of *Premiere's Trusted Supplier Code of Conduct*, you can:

- 1) Call Premiere's Houston Office and request to speak with someone in Executive Management or Human Resources at **+001 (713) 524-2240**.
- 2) Email the Director of Compliance: [CodeOfConduct\\_Compliance@premiereinc.com](mailto:CodeOfConduct_Compliance@premiereinc.com)
- 3) File a formal complaint through Premiere's Ethics Hotline at ([CodeOfConduct\\_HR@premiereinc.com](mailto:CodeOfConduct_HR@premiereinc.com)) or report the concern by contacting the Premiere Ethics Hotline via the following ways:

### Toll-Free Telephone:

English speaking USA and Canada: 800-401-8004

Spanish speaking USA and Canada: 800-216-1288

French speaking Canada: 855-725-0002

All other countries: 800-603-2869

**(Must dial country access code first [click here](#) for access codes and dialing instructions)**

**Website:** [www.lighthouse-services.com/premiereinc](http://www.lighthouse-services.com/premiereinc)

**E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)

**Fax:** (215) 689-3885 (must include company name with report)

Suspected violations can be reported anonymously, where permitted by local laws, or by identifying yourself. Depending on the circumstances, Suppliers should be aware that in some cases, it may be impossible for Premiere to conduct a full investigation while maintaining your anonymity.

Premiere treats all reports as confidentially and consistently as possible and in compliance with the law. We promise to deliver appropriate corrective action, as necessary.

**BY EXECUTING THIS DOCUMENT IN THE SPACE PROVIDED BELOW, THE UNDERSIGNED ACKNOWLEDGES THAT SHE/HE HAS READ AND UNDERSTOOD THIS DOCUMENT AND AGREES TO COMPLY WITH THE CODE AND THE POLICIES AND AGREES TO CONDUCT HERSELF/HIMSELF IN ACCORDANCE WITH PREMIERE'S CODE OF CONDUCT.**

**ACKNOWLEDGEMENT**

\_\_\_\_\_  
Printed Name of Trusted Supplier, Company

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Authorized Representative of Trusted Supplier, Company