

# COUNTERFEIT COW PRODUCTIONS, LLC

## Company Code of Conduct

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## EXECUTIVE SUMMARY:

As the company continues to expand by taking on new clients and hiring more employees and interns it has become increasingly important to establish the Counterfeit Cow Productions' (CCP) moral values.

This “company code of conduct”, includes a social media policy, outlines principles of CCP’s code of ethics, defines standards for professional boundaries, standards for the use of company space and equipment, as well as a clear description of consequences for violating these policies.

### **Who is this document for?:**

Our company code of conduct is a resource for CCP employees and interns to refer to should there ever be a question of conduct ethically or legally. Employees please use this document to get a better understanding of CCP’s overall mission and our responsibilities to our clients.

### **About Our Policies:**

These policies include our company commitment to our clients, the media industry, raising awareness for the causes our company endorses, and our ongoing efforts to go green.

A code of conduct is defined as an “open disclosure of the way an organization operates.” It provides visible guidelines for behavior. A well-written and thoughtful code also serves as an important communication vehicle that reflects the covenant that CCP has made and upholds its most important values and its standards for doing business and its relationship with the community.

### **Resource:**

Ethics and Compliance Initiative – document “Why have a code of conduct?” (link)  
<http://www.ethics.org/resource/why-have-code-conduct>

### **Summary:**

This company code of conduct covers behavior in the workplace in regards to the press, social media, copyrights and intellectual property, company equipment and devices, or relationships between cow-workers or employee/client relationships. This document outlines risks and provides guidelines and procedures for employees to follow with the company’s best interest in mind. Our company’s commitment to our employee’s personal safety and protection of their personal and private information.



## | A Message from the President

### Matt Heron-Duranti



“There comes a time when one must take a position that is neither safe, nor politic, nor popular, but he must do it because Conscience tells him it is right.”

**Martin Luther King Jr.**

Dear Counterfeit Cow Employees,

Our company continues to grow throughout the media industry, evolving to meet client’s needs and keep up with the changing technologies. One thing that does not change is our commitment to operating with the highest ethical standards. Our company standards have earned CCP a reputation of fairness and honesty throughout our community.

CCP’s Code of Conduct sets the standards by which we conduct our business. It covers a range of subjects from the use of company funds, to conflicts of interest and protection of client information. It applies to all directors, producers, managers and employees, setting clear expectations, the standards to be followed our business. Producers have an added responsibility to lead by example and ensure that our Code is followed in areas under their supervision. Regardless of position at CCP violations of our Code will not be tolerated.

Our Code is not a substitute for good judgement, nor does it cover every situation you may encounter during your professional career with us. The basic principles and standards are here. You must understand and apply them to your work. When in doubt, ask your managers for guidance.

Thank you for your continued dedication to Counterfeit Cow Productions and your commitment to upholding our company standards.

Best Regards,

A handwritten signature in black ink, appearing to read 'MHD'.



## Our Commitments

We have made a commitment to conduct our business ethically and lead with integrity. Our Code of Conduct explains how to uphold our commitments as we interact with various groups that have stake in our company's success.

We believe that film has a great responsibility to raise social awareness through entertainment and all our projects are designed with this in mind.

### Our Commitment to Fellow Employees

We treat one another fairly and with respect, valuing the talents, experiences and strengths of our diverse workplace.

### Our Commitment to Artists

We maintain the trust artists place in our productions, providing safe productions and honest practices.

### Commitment to our Audiences

We understand that media is an important platform for social change and design all our projects with this in mind.

### Our Commitment to Our Clients

We act honestly and transparently at all times, maintaining the trust our clients have placed in us.

### Our Commitment to the Community

We make a positive difference in the community where we live and work through our volunteer and political activities.

### Our Commitment to Media

We honor competition laws, and respect copyright and intellectual property laws, all content created by our employees is original.



# What Are Our Responsibilities?

## All Employees Are Required to Read This Document

As employees, actors, directors, producers and managers of CCP, we have made a commitment to understand and follow the principles set forth in this Code.

- *Familiarize ourselves with and follow all policies, laws and regulations that apply to our jobs.*
- *Conduct our business according to the highest ethical and legal standards possible.*
- *Report concerns and known or suspected misconduct immediately.*

At this time, we state that we will disclose any misconduct we know of and have not previously reported, or that we are not aware of any violations of our Code.

...

**We must immediately report any known or suspected ethical or legal misconduct.**

...

CCP producers and managers face additional responsibilities. In particular they are required to:

- *Act as role models, holding themselves to the highest standards of ethical business conduct.*
- *Reinforce our Code and make sure employees understand the behaviors expected of them.*
- *Create a positive work environment where employees are comfortable raising questions and concerns.*
- *Monitor employees' business practices to ensure our ethical standards.*

Producers and production managers must immediately report known or suspected ethical or legal misconduct and never retaliate or ignore acts of retaliation against others. Those who fail to report a known violation – or should have known about – may be subject to job termination

Our Executive Producers must uphold managerial responsibilities, as well as our Code commitments. In addition, they're responsible for knowing and adhering to the additional obligations that result from their position at CCP.



## How will I know if there is a problem?

When facing an ethical dilemma, think through the issue and reference CCP's Code of Conduct.

“Character, is doing  
the right thing  
when nobody’s  
looking.”

J.C. Watts

CCP's Code of Conduct addresses some common legal and ethical issues that we might encounter. However, it cannot address every question that may arise. When you face an ethical dilemma, think through the issue and reference available resources, such as CCP's Code of Conduct. You can assess the situation by asking yourself the following questions:

- Do I think my action complies with the law?
- Does it feel like the right thing to do?
- Does it follow our Code of Conduct and other CCP policies?
- Would I feel comfortable if others knew about it?

If you cannot answer “yes” to all of these questions, do not take action. Instead seek guidance if you have any additional questions about the situation.

You may also come across situations that pose ethical dilemmas while conducting business internationally. If another country's local law, custom or practice conflicts with U.S. law, Company policy or this Code, seek guidance from the CCP production office. In all circumstances, we must adhere to the law.



## How so I seek guidance and report concerns?

If you are aware of or suspect unethical or illegal conduct, you have a duty to report the issue or seek guidance. Consider speaking first to a manager or producer with whom you feel comfortable. You may also ask questions or raise issues in any of the following ways:

- Bring it to the producer or the production manager.
- Write to the production office  
CCP Media  
ATT: Sari Gagnon  
P.O. Box 2937  
Amherst, MA 01004
- Send an email the production office at [counterfeitcow@gmail.com](mailto:counterfeitcow@gmail.com)

In general, directors, actors, crew and staff should seek guidance or make a report by contacting the Counterfeit Cow Production office.

However, if the issue involves a financial or accounting matter speak to President Matt Heron-Duranti.

CCP will investigate all reports promptly, thoroughly and fairly, taking appropriate action whenever necessary, You are expected to participate in an investigation when asked.

Every effort will be made to safeguard your confidentiality both during and after the investigation

...

Keep this contact information in order to make a report. You can also make report by phoning the production office at 347-468-0524

...



## What if I am concerned about retaliation?

Our company does not tolerate acts of retaliation against anyone who makes a good faith report of known or suspected ethical or legal misconduct. A “good” faith report means that you have provided all of the information you have and you believe it to be true. In addition, our company prohibits retaliation against anyone who participates in investigations in good faith.

Retaliatory acts may lead to disciplinary action against the person responsible for the retaliation, up to and including termination. If you believe you have experienced retaliation you should report it immediately.

## What are the consequences for violating the code?

Violations of our Code may carry serious consequences, including termination, and possible civil or criminal liability. While certain sections of our Code reference the potential consequences of the ethical and legal misconduct, keep in mind that CCP retains the right to apply disciplinary action in response to acts of misconduct.

...

Counterfeit Cow Productions does not tolerate acts of retaliation against anyone who makes a good faith report of known or suspected ethical or legal misconduct.

...

Eddie recently overheard his production manager talking on the phone about CCP’s newest project that hasn’t gone public yet. Eddie thinks the conversation may have violated CCP’s confidentiality agreement. He wants to report his production manager’s behavior, but is afraid that if he is wrong, his production manager won’t hire him for the next project. What should Eddie do?

*Eddie should report what he heard. Whether or not his concerns turn out to be valid, he will have made the report in good faith and will be protected from retaliation. He should report the issue by contacting the production office.*



## Our Commitment to Fellow Employees

### Respect and Promote Diversity

We must all work to create a positive and diverse workplace that is free from discrimination and harassment.

By working for CCP, we have made a commitment to treating each other fairly and with respect. This means we must not make any employment-related decisions based on bias against a person's race, color, gender, national origin, age, religion, citizenship status, disability, medical condition, sexual orientation, gender identity, veteran status, marital status or any other basis protected by law. We must also ensure that our workplace is free from harassment. While the definitions of harassment and sexual harassment may vary from one country to another, at company harassment

includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment. It can take many forms, including physical actions, spoken and written remarks, and videos or pictures. Sexual harassment can include unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature. Regardless of the form it takes, harassment negatively affects the individual work performance and our workplace as a whole, and it will not be tolerated.

...

If you experience or become aware of any act of discrimination or harassment, you have a duty to report it. You will not face retaliation for making a good faith report.

...

Samantha feels harassed by her coworker, Jerry. Jerry constantly comments on her appearance in a way that makes her feel embarrassed and uncomfortable. It's gotten to the point where she hates coming in to work. What should she do?

*Samantha should report the situation to a producer or production manager she feels comfortable at the production office. Jerry's behavior is creating an intimidating and offensive environment for Samantha and may even be affecting her job performance.*



# Our Commitment to Employees Safety & Privacy

## You are Important to Us

### Maintain a Safe and Healthy Work Environment

We must follow all safety procedures and report any safety hazards or unsafe behavior.

We must all work to maintain a safe and healthy work environment. This means we are required to follow all safety laws and procedures, observe posted safety related signs and use caution while using company equipment. You should immediately report any unsafe conditions or activities.

Acts or treats of violence interfere with our commitment to health and safety and will not be tolerated. Any threatening behavior, even if made in a seemingly joking manner, must be reported immediately. If you or someone you know is in immediate danger, call local law enforcement authorities before reporting the incident through normal channels.

Drugs and alcohol in the workplace affect everyone's safety. Being under the influence of either can negatively affect job performance and cause severe safety hazards. You may not possess, distribute or be under the influence of illicit drugs while on a CCP set or while conducting business in our offices. In addition, you must always conduct yourself according to our *Substance Abuse Policy*, especially with respect to the possession or use of alcohol, prescription drugs and other controlled substances.

CCP does periodically host cast or wrap parties to celebrate finishing a project. These designated times and locations are the only acceptable ones for drinking. At which point we advise you do so with caution and never drive after drinking.

### Respecting the Privacy of Employee Information

We must protect one another's private and personal data

During the course of your employment, you may provide sensitive personal, medical and financial information to us. CCP is committed to protecting this information, whether in paper or electronic format.

- *Compensation information*
- *SSN# or driver's license information*
- *Medical information*
- *Contact information, such as home addresses and telephone numbers*
- *Emergency contact information*
- *Private passwords or profile information*

No one can access coworkers' sensitive information without specific authorization based on a business-related need. If you do have access to this information because of the nature of your job, you must take special care to safeguard it and to use it only to the extent necessary to do your work in accordance to the law.

...

**Acts or threats of violence interfere with our commitment to health and safety and will not be tolerated.**

...



## Our Commitment to Our Clients

### Services Clients Can Trust

Our clients trust us to provide high-quality services, and CCP's success depends on our preservation of that trust. We must make sure that the services we provide are safe, comply with applicable laws and regulations, and consistently meet or exceed the standards established by CCP. If you are involved in the production of our services and have contact with equipment or filming materials,

you must follow all quality procedures that apply to your job. **You must report any concerns about safety immediately.**

An important aspect of maintaining client trust is holding crew members accountable for the quality and safety of the set and services CCP provides. If you know or suspect that a crewmember is not upholding its commitments to quality and safety, it is your responsibility to report the situation.

**We must ensure that the services we provide are safe, comply with applicable laws and meet our standards.**

While on a break, Anna watches a gaffer set up a lamp. She thinks she sees it fall over, but the gaffer doesn't make an effort to mend the lamp upon standing it up. Afterwards, the lamp doesn't appear to work. What should she do?

*Anna should report the incident to the producer or production manager immediately. This way, any affected equipment can be accounted for and replaced right away and the incident can be investigated.*

**Market Our Services Ethically: We must never make misleading or false statements about our services or those of our competitors.**

We truthfully market, promote and advertise our services. This is consistent with our commitment to acting honestly in all our business affairs. All descriptions of our services and process must be truthful and accurate, meaning we must:

- *Make only fair, fact-based comparisons between our services and those of our competitors*
- *Never misstate the facts or mislead clients through advertisements, branding, promotions, or press correspondence*

In addition, we must ensure that our marketing is appropriate for its intending audiences.

...  
We truthfully market, promote and advertise our services.  
...



## Our Commitment to the Industry

### Fair Deals and Competitiveness

We must deal fairly with our clients, industry associates, equipment suppliers, and competitors at all times.

CCP is fast on its way to becoming a staple in the multi-media industry, based on the quality of our team, products, and services. Our commitment to fair dealing

- *Provide only honest and truthful information to our clients, associates, suppliers and competitors*
- *Never misrepresent the facts in order to gain a competitive advantage*
- *Never engage in any sort of illegal or unethical conduct when competing*

Mark is negotiating with an equipment supplier and attempting to get the lowest possible price for CCP. He considers mentioning to the supplier that offering a very low price now will lead to increased business from CCP in the future. Mark knows that the chances of this happening are low, but believes this statement is somewhat true and wants to help CCP. Is this the right thing to do?

*NO. Mark must only make statements that are completely honest and truthful when negotiating. Even though the statement Mark is considering making may benefit CCP in the short term, taking unfair advantage of others is unethical and won't benefit anyone in the end. Mark should only make that statement if he intends to contact the supplier for repeat business in the future.*

### Comply with Competition Regulations

**We must compete according to the rules and regulations determined by film festivals and competitions.**

In order to compete fairly and with good sportsmanship, we must follow the rules and regulations in place when creating a project.

In addition to complying with these rules, we must avoid the following actions:

- *Discussing with competitors conceptual project ideas*

- *Discussing with competitors production costs, product suppliers, marketing budgets, location scouting, etc.*
- *Advising competitors to boycott festivals*
- *Disobeying individualized competition guidelines*

If a competitor discusses any of these topics, no matter how casually, stop the conversation.

Be particularly careful at industry association meetings or events to avoid discussing details of any project in development or pre-production.

Be advised that some of CCP's projects are documentaries and we have a responsibility to protect very sensitive content and the anonymity of all our interviewees.



# Our Commitment to Funders

## Fiscal Sponsorship, Donations & Investments

We must ensure that our financial records are full, fair, accurate, timely and understandable.

CCP has a duty to ensure that all entries in our financial records give an honest picture of the results of our operations and our financial position. We do this by complying not only to our company policies, but also the laws, rules and regulations that govern our financial accounting and reporting.

This means we must:

- *Accurately record all assets, liabilities, revenues and expenses*
- *Keep client invoices and collect all production receipts*
- *Never make false or artificial statements about our production budgets*
- *Always fulfill our commitment to those who offered funds to our projects in a timely fashion*
- *Keep all funder donation and contact information confidential*

Lucy has access to company systems that allow her to update a sponsor's agreement.

Lucy considers adding our current production to the agreement instead of the projected project for next year, thus allowing us to use the funds sooner.

Is it ok to do this?

*NO. Sponsors and investors agree to fund specific projects for various reasons. Funds provided by the sponsor or investor must go to the project on the agreement. Altering the agreement may alter CCP's accounting. Changing any document information is prohibited.*

We must ensure that financial information disclosed to our accountants and the IRS is full, fair, accurate, timely and understandable.

We are required to:

- *Maintain reliable quarterly records*
- *Accurately represent company and individual project incomes*
- *Ensure that who performs accounting and financial reporting functions know and adhere to the privacy of those involved and are lawful in their accounts*

We must immediately report the following:

- *Any violation of any law*
- *Any incidence of fraud by material or person responsible in connections with financial reports*

These matters will be reported to the authorities in accordance with CCP policy and legal requirements.



# Company Property

## Protecting Physical Assets

We must protect facilities and equipment that CCP owns, rents, or borrows for business purposes.

CCP's assets belong to the company, or they are under the company's supervision, therefore we are responsible for the care of items and locations we use for business purposes. We must therefore take great care when using these assets and protect them at all times from loss, damage, theft, misuse or waste. In addition assets may only be used for legitimate business purposes, unless limited personal use is permitted by CCP management.

**Protecting Proprietary and Confidential Information**  
Information is a company asset, and we must take steps to protect CCP's and its employees' confidential information from disclosure. Such information may include pricing plans, cost information, sales figures, financial results and project budgets, as well as intellectual property regarding investments. Your obligation to protect this information continues even after your employment ends, as stated in CCP's Confidentiality Agreement signed upon employment.

### Using Computers and Network Systems

Use company computers, devices, and network systems appropriately at all times. We must take care to compose all emails, text messages and other electronic communications in the same professional manner as all our written correspondence.

While limited personal use of computers, devices, and network systems is allowed, we must make sure that our personal use does not detract from our work. In addition, we may never use computers, devices, company- issued cell phones, or network systems for improper purposes, such as:

- *Communicating inappropriate, sexually explicit or offensive statements*
- *Viewing sexually explicit or offensive materials*
- *Spreading profanity, derogatory remarks, discriminating or harassing comments, or threatening or abusive languages*

When using company-issued technologies, such as computers and tablets, cell phones and voicemail, and company email addresses or social media accounts, you should not expect that the information you send or receive is private. CCP reserves the right to monitor activity to make sure these resources are used appropriately. CCP reserves the right to block access to inappropriate internet sites, as well as the transmission of inappropriate emails or comments.

Tim often works in the studio after hours editing. Sometimes, when he's alone in the office late-night, he reads personal emails that some may find obscene and forwards them to his friends. Tim thinks he isn't disturbing anyone, and isn't harming CCP since it's after operating hours. Is he right?

*NO. It is never ok to use CCP computers, devices, or network systems to view or forward inappropriate materials, even if you're alone in the office, at home or on a business trip. Also, Tim should not expect his correspondence to be private when using company internet, email addresses, profiles, equipment or systems.*



# Copyrights and Intellectual Property

## Literature, Art, Names, Images, Designs and Assets used in Commerce

Intellectual property includes but is not limited to designs, literature, works of art, film, music, names or brands and web designs.

All said materials are protected from use without written expressed permission from CCP's production offices.

Copyright laws protect CCP's written or artistic expressions fixed in a tangible medium, including the expression of an idea in development. Copyrights last for the life of the author plus another 50 years.

All said materials copyrighted by clients can only be used, manipulated, changed or promoted, through written expressed permission from the client or owner of that intellectual property.

...

We must not use intellectual properties without written expressed permission.

...

Henry is working on a client's website and has noticed a typo in the client's logo. Henry figures the client would want it to be spelled correctly and changes it with no trouble before adding it to the client's website. Was this the right thing for Henry to do?

*NO. It is never ok to change a client logo without seeking written permission. The logo that has either been approved by the client or submitted by the client directly and should not be tampered with according to copyright laws. Logos may be spelled or designed a certain way determined by the client.*



# Confidentiality Non-Disclosure Agreement

All company employees are required to sign a Non-Disclosure Agreement.

Counterfeit Cow Productions often manages multiple projects at the same time.

All confidential information shall remain the property of CCP and shall not be disclosed or revealed to anyone except to CCP executives, it agents, licenses, successors and assigns.

To protect our clients' interests, a subject's anonymity, artistic collaborations, etc. CCP requires all employees, interns, volunteers, and the like to sign a Non-Disclosure agreement which restricts staff from discussing projects or client information with outside entities without written expressed permission from CCP offices.

All information disclosed to CCP, and/or those individuals or organizations working in collaboration with CCP, written, electronic or oral, that relates or refers directly or indirectly, to Projects, or General Business, in any stage constitute as Confidential Information.

...

All Confidential Information shall remain the property of CCP and shall not be disclosed or revealed to anyone.

...

## AN EMPLOYEE'S OBLIGATION

is to protect all client, subject, and project information, and this obligation continues even after employment ends, as stated in CCP's Confidentiality Non-Disclosure Agreement signed upon employment.

Don has been asked by a client if the company intends to pursue offers for distributing a specific project. Should Don explain to client what the company's intentions are?

*NO. Don is prohibited from discussing any company agreements or negotiations with clients without written expressed permission from the company due to the confidential nature of negotiations.*



## Avoid Conflicts of Interest

We must never let our personal interests interfere with our ability to make sound, unbiased business decisions.

Conflicts of interest arise in many different forms. In general, a “conflict of interest” occurs when a personal or family interest interferes with our ability to make sound, objective business decisions on behalf of CCP. We must avoid any situation that might put us in such a position or create even the appearance of bias. If you have knowledge about a possible conflict of interest, you should disclose it immediately.

While it is impossible to address every situation where a conflict of interest may arise, use this Code of Conduct to provide you guidance.

You must speak with your manager before doing anything that may feel like a conflict of interest.

Valerie wants to show her appreciation to some of her clients by sending each of them a Holiday gift basket of fruit and wine, valued at \$75.  
Is that ok?

*Valerie should speak with the managers at the production offices before doing this. Gifts are a good way to give thanks and build relationships with clients, but such lavish gifts could create the appearance that Valerie is trying to sway business decisions to create a sense of obligation from her clients which may violate their ethics policies.*

...

Before you act on anything that may be a conflict of interest speak to your producer or production manager.

...

### Accepting Corporate Opportunities:

We may never take personal advantage of a business or investment opportunity that we become aware of through our work for CCP, unless and until our company has had an opportunity to evaluate it and has chosen not to pursue it. Seek management approval before accepting the job.



### Giving and Accepting Gifts

Business gifts and entertainment are often appropriate courtesies that build goodwill between CCP and those we do business with. However, a conflict of interest may arise if these courtesies are used to influence a business decision.

You may not accept a business gift or entertainment if:

- *Doing so would make it difficult to make fair and unbiased decisions*
- *It exceeds a nominal value*
- *It exceeds commonly accepted business practices*

Common examples of business gifts that have nominal value include hats, mugs, mouse pads and moderately priced promotional items. Having lunch at a moderately priced restaurant for the purpose of discussing business is generally an acceptable form of entertainment.

If you are offered entertainment or a gift that does not meet the guidelines discussed in this section, you should receive approval from CCP executive offices.

We must also ensure that a conflict of interest does not arise when we give gifts, provide favors or extend any sort of special consideration or discount.

You may not give business gifts or entertainment:

- *To influence a business decision*
- *With the expectation of receiving anything of value in return*
- *If it exceed accepted business practices*

Unless specifically authorized, you may not give or accept a business gift if it is cash or a cash equivalent.

### Business with Friends and Family

We must avoid personal relationships that could improperly influence business decisions.

Therefore, you are not permitted to have direct reporting responsibility over an immediate family member, meaning, your spouse, domestic partner, children, siblings, parents, in-laws, etc.

You must also disclose to your manager any intimate relationship that you have with a person who directly reports to you.

You may not engage CCP in a business relationship with a family member without authorization.

### Personal relationships formed between CCP employees and our clients are prohibited.

We require that all working relationships remain professional, but should a romance evolve between a CCP employee and a client, you should inform the production office of the relationship immediately.

Relationships that form between our employees and clients may directly affect CCP business. CCP producers reserves the right to remove employees from accounts for this purpose.

Any undisclosed relationship may result in termination.

Any employee that makes inappropriate advancements on a CCP client may be terminated.

It is advised that you seriously consider the consequences before entering into any personal relationship with a client.

### Outside Business Interests

Working, participating, or investing in another company's projects outside your employment at CCP is not prohibited.

However, we expect that CCP project details and confidential information will not be discussed with competing companies.

In general we may not:

- Share budget or financial plans
- Divulge production plans
- Divulge distribution plans
- Share employee, client, or investor information

Should an investigation reveal that a CCP employee has released our project details to a competing company, or defames the character of the company or executives to a client, the press, or third-party business entity, that employee may not only be subject to termination but also a law suit for damages if business relationships are injured by breaking the Confidentiality Non-Disclosure Agreement.

**Some entities of CCP have their own Committee.** As a Board Member you must obtain advance approval from the Committee prior to representing CCP on behalf of that entity. Serving on a Board of

Directors for a non-profit organization you are encouraged to only accept the position if you can commit to making decisions ethically.



## Press Releases and Inquires

### Responding to Requests Responsibly

It is important for us to speak about our company with one consistent voice. We must not violate CCP's Confidentiality Agreement. Therefore, we may not make public statements on our company's behalf unless we have been designated to do so.

Instead, refer media requests to press releases offered on the CCP website or to Company Spokesperson, Sari Gagnon. This includes personnel from government or law departments.

...

We must not make public statements about our company unless we are authorized to do so.

...

Dan has been contacted by a journalist requesting information about a rumored film production. Dan has heard a lot of discussion on the set about the production and knowing that the news would likely boost audiences' interest in CCP he believes he might be helping CCP by passing on what he heard. Should Dan speak to the journalist?

*NO. Dan shouldn't divulge what he has heard to the journalist. The information he possesses may be incorrect or incomplete. Even if the information were correct, sharing it with the journalist could harm CCP's business ventures. Dan should forwards the journalist the press releases on the CCP website or encourage the journalist to reach out to a CCP spokesperson.*

All employees are required to sign a confidentiality agreement.



# Our Company Social Media Policy

## Responsible Interactions

CCP embraces social as an important form of content and communication and a tool to strengthen business by engaging and interacting with our community. We recognize that employees are participating in, contributing to, and creating all forms of social media daily. As with other forms of communication, CCP requires that all employees and interns act with a responsible manner which reflects well upon employees and CCP alike.

Regardless of why employees participate in social media, whether as a private citizen or as a CCP employee/intern, all are expected to know and follow our Social Media Policy at all times in order to protect CCP's interests as well as the interest of the employee.

Business and personal social media activity should be kept separate. Understand that when you say that you work for CCP, or reference your employment at CCP in a social media profile, it creates a perception in the mind of others as to what you know, your area of expertise, and your authorization to make certain statements on behalf of CCP.

Those who read your social media communications may also make certain assumptions about the factual support for, or context of, your communications. As you participate in social media activity, be mindful that, intended or not, you may be viewed as representing CCP and for this reason alone you are expected to maintain the high standards of integrity and decorum expected of all CCP employees and interns.

### **Business Use of Social Media:**

Certain CCP employees and interns are required to use social media as part of their daily responsibilities. CCP sponsors company pages, profiles, and areas on public social networks to build brand awareness and/or promote CCP, its projects, films/shows, or other assets.

Only employees and interns authorized by CCP should post, delete, edit or modify content on any forum sponsored by CCP. Participation on social media platforms as an authorized representative of CCP, you are expected to uphold the high standards of integrity and decorum required of all CCP employees in any and all professional settings.

Be aware that endorsing advertisements, products, politicians, or celebrities without authorized permission is prohibited.

### **Personal Use of Social Media:**

It is encouraged that use of social media outside work is done in the lawful manner in full compliance with CCP policies, as well as the lawful user terms and conditions of the social media platforms.

Participation in social media must not damage CCP's brand or reputation. You are personally and legally responsible for any consequences of your online activities.

Should you participate in online conversation that discusses work or CCP, you must identify yourself, use your real name, and state that you work for CCP. Use transparency and integrity, do not pretend to be someone you are not or use a fake name. Be honest about what you do at CCP and your role, especially when commenting on CCP, its projects, films, shows, products, assets, or services.

**When posting about work at CCP, use the legal disclaimer stating that:**

*"The views and opinions expressed here are my own and do not necessarily represent the views or opinions of Counterfeit Cow Productions, LLC or other employees, clients, or customers."*



Anything written online is your personal responsibility. Be advised that digital content lives for a long time, disperses throughout the community instantaneously, and can be almost impossible to correct, change or delete.

### **Voice Concerns:**

If you know of a violation or possible violation of a CCP policy or applicable law, rule or regulation, you have a responsibility to document your concerns in writing and send it to your manager with haste or there may be consequences.

### **Social Media Use at Work:**

Occasional use of CCP resources for personal social media use is permitted as long as it does not violate this Social Media Policy. Excessive use of social media during work hours is not permitted. Use of social media must not negatively affect yours or other employees' performances or impact the performance of CCP equipment, including its electronic systems or devices.

### **Social Media Use on CCP Systems:**

CCP reserves that right to inspect all files, messages and postings created, stored on or transmitted through its electronic systems. Users have no reasonable expectation of privacy on social media accessed through CCP electronic systems or devices, even if a personal, password-protected account is used.

Unless it is required as part of your job responsibilities, avoid using CCP issued email addresses when participating in social media. Use a personal email address for personal social media use. Do not install any social media related software or applications on CCP electronic systems or devices, or change the configuration of existing software without the prior authorization of CCP management.

**Whether use of social media is for business purposes or personal in nature, the following guidelines apply for all use of social media at all times.**

### **Confidentiality and protecting CCP's interests:**

You may learn about confidential or proprietary information about CCP, its customers, clients, business partners, interviewees and other third parties. You may learn of or even participate in a news story in progress, ALL employees/interns must at all times maintain the confidentiality of the information that is entrusted to us and the anonymity of those who entrust it.

Do not publicly disclose or comment on CCP's confidential financial information such as any of CCP's future business performance, business strategies or prospects, or contract wages.

The only exception is if you have been authorized to disclose certain information. Should you see a post about CCP employees, clients,

customers, or contract workers that is false, inaccurate or harmful in nature, address your concerns immediately in writing to CCP management. If you choose to correct such information yourself do so with respect, use facts, and identify yourself and your affiliation with Counterfeit Cow Productions, LLC.

### **Sharing Information:**

For employee protection, as well as CCP's, respect all laws governing proprietary information, intellectual property, copyright, trademarks, logos, brands and other similarly protected materials at all times, including CCP's own copyright and brands.

Credit the source of the material and provide links to others' work when appropriate. Request permission prior to using/posting someone's photo. Do not use links to sites that contain illegal, unauthorized or pirate content.



**Use Civility:**

CCP is well established on the web, and its employees, interns, business partners, clients, customers, and contracted workers reflect a diverse set of customs and values. Be respectful of others and their diverse opinions and points of views at all times. Clean humor, and healthy debate or conversation is advised.

Use caution engaging in topics of an inflammatory nature such as politics and religion.

Be advised that offensive and threatening behavior on social media is not to be tolerated and can lead to immediate termination of employment.

Should a financial loss occur for CCP or its clients, from inappropriate posts, CCP or its clients reserve the right to seek legal action.

Do not post material that is discriminatory, defamatory, profane, libelous, threatening, harassing, abusive, hateful or obscene.

This includes (but is not limited to) comments regarding CCP, our employees/interns, business partners, clients, customers, contract workers, and competitors.

**Protect Your Reputation:**

You are advised to defriend those who might damage your professional reputation. Use privacy filters and other security tools, but be advised that no area online, no matter how gated or private it appears, is entirely private. Treat all online activities and postings as permanent and legally discoverable.

All employees are required to sign a copy of our social media policy.

Sharon reads a magazine article about an actress going through a divorce because of her infidelity. Sharon Tweets about her personal opinions of the actress on her personal profile. Later Sharon learns that the actress' manager is also managing another performer that CCP is trying to hire. Her comments as a CCP employee may hurt CCP's negotiations. Sharon promptly removes her comments and hopes not many people saw them. Should Sharon bother to disclose her comments to the production office?

*YES. Even when removed, nothing is ever fully erased from the internet. Sharon should discuss her social media actions with managers at the production office. Damage control for social media comments is very tricky, companies can be sued for defamation of character. It is best not to make comment, no matter how innocent it might seem, about any member of the media or entertainment business, or any current or potential clients at CCP.*



# Our Commitment to Our Community

## Caring About Our World

### Protect Our Environment

We are committed to engage in environmentally sound practices. We therefore must meet or exceed the requirements set forth by the environmental laws, rules and regulations that govern the areas where CCP does business. We must also continually assess and strive to improve our processes in order to cut down on energy consumption and waste. If you know of a practice that is harmful to the environment or does not comply with CCP's policies or with governing laws, rules and regulation, you have a duty to report it.

### Political Contributions

CCP does not make political contributions and only engages in political activities that support our Committees' interests.

While we may make political contributions in our own names we should never do so with the intent or expectation that CCP will obtain or retain business as a result. In addition, We may not take part in political activities on company time or use company resources.

### Support Our Community

We make a positive difference in the community where we live and work through our volunteer and political activities. CCP gives back to its community by partnering with select non-profit organizations and through special initiatives, and donate to several non-profits such as, Craig's Door – Homeless Shelter, Not Bread Alone – Soup Kitchen, Honest Beginnings – Sober Living Facilities, and other programs. We are encouraged to support our communities in similar ways. We are always free to make personal charitable contributions.

...

Our values and ethical standards  
guide us to make a positive difference  
in our communities.

...

We must hold our Associates to high standards, expecting that they treat others fairly and incorporate sustainable practices to their operations.

We expect our suppliers to follow the same standards we uphold. We choose suppliers that respect basic human rights wherever they operate. In addition, we expect suppliers to uphold anti-discrimination laws and enforce proper wages and hours for all workers.



# Our Commitment to Our Audiences

## Redefining What a Media Company Can Be

### We believe that film is a powerful platform for social change

While delivering best-in-class content is one of our commitments to our audiences. We want to constantly reinvent the best content, media and services available while staying true to the core principles CCP was founded upon. We also understand what a powerful platform for social change film can be.

#### Mission Statement

We believe that film has a great responsibility to raise social awareness through entertainment and all our projects are designed with this in mind.

- *CCP works with local colleges and universities sponsoring internship programs to create avenues for students to gain experience in the field.*
- *We run a female film collaborative to create job opportunities for women in the film industry.*
- *Our documentaries focus on giving a voice to those members of our society that are often forgotten and unheard.*

#### Values

We believe the future of our brands lies in the power of the individual. Fostering creative minds supporting an entrepreneurial spirit and allowing the freedom to innovate are at the core of delivering our mission.

We always welcome new projects that benefit the social initiatives we believe in, should you have an idea we encourage you to bring it to the attention of our producers and production managers.

#### Vision

To constantly challenge and recreate the definition of what a media company can become; to offer multiple solutions that continuously engage our audiences on all platforms and connect our clients with new markets.

If you learn of a violation against CCP's social initiatives please contact our production office immediately with your concerns.

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We encourage our employees to seek opportunities for social change in all the projects we create.

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## Amending Our Code of Conduct

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Counterfeit Cow Productions, LLC must approve any amendment of this Code of Conduct. Matt Heron-Duranti must also approve any waiver of the Code for all employees including producer and production managers. Any amendment or waiver of the Code must be reported to the production office and will be disclosed publicly if required by law.

**To file a report contact:**

CCP.media

(347) 468-0524

2937 Amherst, MA 01004

counterfeitcow@gmail.com

