

## **HOLLYWOOD FOREIGN PRESS ASSOCIATION**

### **CODE OF PROFESSIONAL AND ETHICAL CONDUCT**

This Code of Professional and Ethical Conduct (the “Code”) sets forth the values, expectations, and standards of the Hollywood Foreign Press Association (the “HFPA” or “Association”) that are essential to achieving our shared mission and goals. Members of the Association must accept and adhere to this Code, and as members, we all have an obligation to maintain and promote professional and ethical conduct. The HFPA, therefore, will strictly enforce this Code.

#### **Who We Are**

The HFPA is a non-profit, tax-exempt 501(c)(6) organization of entertainment journalists who report for international outlets. In 1943, the founding consortium of Los-Angeles based journalists banded together to gain traction in a film industry that, at that time, had not yet realized the importance of international markets and international journalists. Today, we carry forward this founding mission by promoting the importance of film and television in international markets.

#### **Our Mission**

The HFPA is committed to furthering the common business interests of entertainment journalists working for international outlets by promoting interest in entertainment media and establishing and maintaining favorable relations and cultural ties between the United States and foreign nations through cinema, television, and other audio and visual recordings. Our member-journalists disseminate information around the world about the cultures, traditions, and experiences in the United States and likewise disseminate information within the United States about foreign cultures, traditions, and experiences.

The HFPA promotes interest in the study of the arts, including specifically by promoting the development of the art forms of motion picture; television; dramatic, musical, and comedy theatre; and audio and visual recording. As part of this effort, the HFPA recognizes outstanding achievement in the arts by conferring annual Awards of Merit, the Golden Globes. The HFPA is also dedicated to philanthropic efforts, which include contributing to non-profits and educational institutions; helping restore historical films; promoting the study of journalism and the arts through scholarship programs; and supporting internship, mentorship, and scholarship programs for underrepresented and otherwise disadvantaged students interested in journalism and the arts.

#### **Our Commitment to Diversity and Inclusion**

Our Association was founded under the motto, “Unity Without Discrimination of Religion or Race.” Our dedication to diversity, equity, and inclusion, therefore, stems from the founding of our Association, and this Code of Conduct serves to reinforce, expand, and renew that commitment. We must act with intention to promote diversity, equity, and inclusion not only among our members and within our Association, but we must become leaders within our journalistic and entertainment communities so that we encourage and celebrate the authentic, varied voices, experiences, and viewpoints of those behind and in front of the screen. We will

establish and maintain an environment that reflects our global community, empowers members and artists that are underrepresented in the entertainment industry, and fosters a culture that respects and values individuals of all genders, ages, races, ethnicities, religions, identities, and experiences.

### **Our Commitment to Accountability and Transparency**

We are committed to promoting a culture of Accountability and Transparency both within the organization and with our external constituencies.

Accountability: We hold ourselves to the highest standards of professional conduct, including through enforcement of this Code of Conduct. Our actions will send a clear message to the entertainment industry and the general public that the HFPA is focused on promoting its mission and will not tolerate unprofessional or unethical conduct.

Transparency: We will build a transparent Association to develop trust between the HFPA and its outside constituencies, including by publishing our governing documents and facilitating the confidential reporting of any violations of these documents. We further recognize that transparency is also a core value within the organization, and because the HFPA leadership governs the Association on behalf of its members, the full membership has the right to understand the leadership team's decision-making process and to hold the leadership accountable.

### **Our Commitment to Professionalism**

We are an organization of professional journalists. As such, our Association seeks to uphold the highest standards of professionalism in our members' conduct with each other and with outside constituencies.

Welcoming Culture: We are committed to creating a welcoming culture for those outside of our Association, including by acting respectfully and professionally at all HFPA and other industry events, such as press conferences and screenings.

Mutual Respect: We are committed to fostering an environment of mutual respect among our members, where we can engage in robust debates and conversations based on respect for each other's diverse opinions and experiences. Uncivil conduct will not be tolerated.

Commitment to the Association and Its Mission: We are committed to furthering the critically important mission and work of our Association, and we expect our members to act in the best interests of the Association so that we can work collaboratively with each other toward our shared goals.

Ethical Relationships with Third Parties: We are committed to conducting the affairs of the Association ethically and in compliance with all legal requirements. As such, all members must avoid conflicts of interest and adhere to our Conflicts of Interest Policy, including through disclosure of all affiliations with outside organizations.

Principled Golden Globes Voting: We are committed to selecting all Golden Globe nominees and winners based on a process that is beyond reproach. Members must, therefore, avoid any actions that could lead to their impartiality being reasonably questioned. Members are prohibited from

corruptly accepting, agreeing to accept, demanding, or soliciting anything of value in exchange for an action taken by the member in his or her HFPA capacity.

Professional Communication: We are committed to professional communication among our members and with the public. We expect all communications to be honest, made in good faith, and consistent with our commitment to create an environment free from discrimination or harassment. To further promote the professionalism of all written communications, members must use their official HFPA email addresses rather than any personal email addresses when conducting HFPA business (e.g., emailing external parties, including publicists, studios or grant recipients on behalf of the HFPA). Members may not use their official HFPA email addresses for any personal activities (e.g., expressing personal views about the Association or other matters that are not related to HFPA business).

### **Examples of Covered Conduct**

In addition to the specific prohibitions outlined elsewhere in this Code of Conduct and related policies, violations of this Code include, but are not limited to, the following:

- Threatening, harassing or abusing others, either verbally, physically, or in writing.
- Engaging in conduct that is unruly, disruptive, illegal, or endangers the safety of others.
- Failing to follow the rules of any organization or venue hosting, sponsoring, or managing any event that a member attends in an HFPA capacity.
- Expressing views on behalf of the HFPA without express authorization from the Board of Directors (the “Board”).
- Using or attempting to use membership in the HFPA for personal profit, including by selling tickets or credentials received because of a member’s affiliation with the HFPA or using the HFPA name or logo in personal business activities without authorization.
- Publicly disclosing any HFPA matter that is confidential.

Members are, at all times, responsible for compliance with the Code, and the Code shall govern their behavior at all times, including, but not limited to, at press conferences, screenings and other industry events. Members are responsible for their conduct as well as the conduct of their guests, agents, and representatives.

### **Anti-Harassment and Non-Discrimination**

The HFPA prohibits any form of harassment or discrimination based on an individual’s race, ethnicity, sex, sexual orientation, gender identity or expression, religion, age, creed, color, marital status, national origin, ancestry, pregnancy or pregnancy-related condition, medical condition, physical or mental disability, military and veteran status, citizenship status, or any other legally protected characteristic. The HFPA further prohibits and does not tolerate harassment or discrimination against individuals who are perceived to have any of these characteristics or who associate with a person who has, or is perceived to have, any of these characteristics. Because harassment and discrimination undermine the integrity of our organization and our work and destroy the morale of our members, our external stakeholders, and our community partners, the HFPA prohibits such conduct even if the conduct is not severe or pervasive and even if such conduct does not constitute unlawful harassment or discrimination.

Such conduct can include harassment and discrimination that is:

- Verbal (for example, epithets, slurs or negative stereotyping; derogatory statements, comments or jokes; threatening, intimidating, or hostile language);
- Physical (for example, assault or inappropriate or unwelcome physical contact);
- Visual (for example, derogatory posters, cartoons, drawings, or gestures); or
- Retaliatory (for example, threatening retaliation or taking retaliatory action).

This list is illustrative and not exhaustive. We will promptly investigate all allegations of harassment and discrimination, and, if warranted, we will take immediate corrective and disciplinary action, up to and including termination of membership. We will take disciplinary action against a member who engages in conduct that violates this policy even if the member's conduct occurred at a non-HFPA event.

### **Sexual Harassment**

Sexual harassment has no place within or outside of the HFPA. The HFPA is committed to providing a safe environment for our members, the external stakeholders with whom we work, and the public.

Sexual harassment means any harassment based on someone's sex, sexual orientation, or gender identity or expression. Sexual harassment may involve individuals of the same or different genders. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances or requests for sexual favors. Examples of sexual harassment may include but are not limited to:

- Physical assault of a sexual nature or unwelcome intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, or brushing against an individual's body in a sexual nature.
- Unwelcome sexual advances, propositions or other sexual comments, such as sexually oriented gestures, noises, remarks, jokes, or comments about an individual's gender, sexuality, or sexual experience.
- Conditioning any professional benefit on an individual's submission to sexual requests or demands.
- Taking or failing to take action as a reprisal against any individual for rejecting sexual advances.

This list is illustrative and not exhaustive. We will promptly investigate all allegations of sexual harassment, and, if warranted, we will take immediate corrective and disciplinary action, up to and including termination of membership. We will take disciplinary action against a member who engages in conduct that violates this policy even if the member's conduct occurred at a non-HFPA event.

### **Confidential Reporting and Non-Retaliation**

We encourage anyone who is aware of a potential violation of this Code of Conduct or any other HFPA policy to speak up and report any concerns. The Association has contracted with Convercent to operate a hotline and email address that is open to receive any complaints concerning unprofessional or unethical conduct. The contact information is:

[www.HFPAListens.com](http://www.HFPAListens.com)  
(800) 461-9330

Although individuals are encouraged to identify themselves while making reports so that any necessary follow-up can be undertaken, the hotline accepts anonymous reports. In any case, the HFPA will protect the reporter's confidentiality to the fullest extent possible (although information may need to be shared to facilitate an investigation and response to a report).

The Association strictly prohibits and does not tolerate any form of discipline, reprisal, intimidation or retaliation against anyone, including HFPA members, staff, or external stakeholders, who in good faith provides information, participates in an investigation, reports suspected illegal or unethical activities, or raises concerns regarding conduct by the Association, its members, staff, or agents that the reporting party reasonably believes constituted a legal violation or violation of the HFPA's policies.

We encourage the immediate reporting of any form of retaliation through one of the reporting mechanisms described above. Any member found to have engaged in retaliation will be subject to immediate disciplinary action, up to and including termination of membership.

## **Enforcement**

Members are, at all times, responsible for compliance with the Code in its then current form. Any violation of this Code may result in disciplinary action, including a refusal of admission to or ejection from HFPA events, and suspension or termination of membership.

Any applicant for membership who is found to have engaged in conduct prohibited by this Code of Conduct or any other HFPA policies will not be admitted to the HFPA.

The process for investigating and enforcing violations of this Code of Conduct shall include the following steps:

- All reports received will be investigated in a fair, timely, and thorough manner. This investigation shall include, among other steps, an offer to speak with the reporting party and the accused member. When warranted, a third-party investigator will conduct investigations.
- The investigator will provide its factual findings to the full HFPA Board and will make recommendations regarding potential disciplinary actions.
- If the investigator substantiates the allegations, the Board will immediately initiate a disciplinary process against the accused member.
- The Board shall initiate this disciplinary process by sending written notification to the accused member stating that the Board is intending to take disciplinary action and providing the accused member with fourteen days to respond in writing. When warranted by emergency circumstances, the Board may provide the accused member with a shorter period to respond.

- In this written response, the accused member can request a meeting with the Board, which shall be held expeditiously.
- After the Board has reviewed any written and/or oral remarks from the accused member, or, if the accused member provides no response, after the expiration of fourteen days from the written notification, the Board shall reach reasonable conclusions based on the information collected and vote on whether an appropriate disciplinary sanction is warranted.
- When voting on the appropriate sanction, the Board shall be guided by, among other factors, the severity of the conduct, the substantiation for the conduct, and the accused member's past conduct. Sanctions may include exclusion from events or suspension or termination of membership. Conduct that could result in termination of membership includes violations of the anti-harassment, non-discrimination, sexual harassment, or non-retaliation provisions of this Code of Conduct.

### **Amendment**

The Board of the HFPA may amend, supplement, or supersede this Code of Conduct upon approval by the membership. Following any such amendment, the Board will provide all members with the revised Code of Conduct and alert all members to all revisions during the next General Membership Meeting.

### **Compliance with Other Policies and Mandatory Trainings**

All members must adhere to this Code of Conduct as well as all other HFPA policies, procedures, and bylaws.

Members must also attend all mandatory HFPA trainings (including, but not limited to, sexual harassment and implicit bias trainings).

**HOLLYWOOD FOREIGN PRESS ASSOCIATION**  
**Code of Conduct Certification**

This is to acknowledge that I have received, read and fully understood the Hollywood Foreign Press Association’s (the “HFPA”) Code of Conduct. I agree to comply with all the rules contained therein. I will participate in the HFPA’s training as required. I understand that failure to comply with the Code of Conduct and any other applicable policies may result in disciplinary sanctions, which may lead to suspension or termination of membership. The Code of Conduct does not create any contractual obligations between me and HFPA.

Signature: \_\_\_\_\_

Name (print): \_\_\_\_\_

Date: \_\_\_\_\_

Delivery Instructions: Upon initial roll-out of the Code of Conduct and once annually thereafter, all HFPA members should complete this form and deliver to Karie DiNardo.