Code of Conduct

By entering into a Master Production Service Agreement with Gamma, or any other commercial or media relationship (including but not limited to influencer, ambassador, or as a performer for one of our brands or producers), you agree to adhere to this Code of Conduct, amongst other things. We (including all majority-owned or controlled entities and/any of our Business Units) are committed to incorporating robust practices to ensure business ethics and integrity is at the forefront of our productions and commercial ventures. The principles of responsible content creation, corporate integrity, and the safety and wellbeing of all individuals involved in a production crew are of paramount importance to Gamma. These principles, and this Code of Conduct (the "Code"), apply to all Contractors ("**you**", or the "**Contractor**"), Subcontractors, Crew Members, and Performers (together, the "**Production Team**"). If you or any of your Production Team violate the Code, or fail to report a violation, Gamma may take corrective action, up to and including terminating its business relationship with you.

1. Values Statement

As members of the adult entertainment industry, you and your Production Team have the privilege of working together to produce creative content. We expect that everyone observes and reflects Gamma's values before, during, and after a Production. Gamma advocates for safe working environments for **all** individuals, and provides certain post-production and talent liaison resources to the Production Team.

Gamma expects all third parties with whom we do business to maintain and uphold professional standards. You and your Production Team must:

- Behave appropriately and with integrity at all times;
- Comply with all relevant legal and regulatory requirements, including all public orders and similar requirements published by local and national governments in relation to public health concerns, such as any pandemic, epidemic, or other public health concern, for example, COVID-19;
- Act responsibly, professionally and in a workmanlike manner both on and off the set of a Production.

2. Definitions

Consent Checklist: a Performer's written list that may contain any sexual acts, sexual themes, language, or which may identify other Performers, with which, or with whom, they or are not comfortable performing in a Production. Absence of a specific act, theme, language, or Performer from the list **does not** constitute positive consent.

Contractor: the producer (who may be a natural or legal person) whose primary responsibility is to create the Production for Gamma, and who may also undertake all or some of the following responsibilities:

- Being accountable for the final Production;
- Identifying and scheduling Performers for the Production;
- Securing Shooting Locations; and
- Hiring Crew Members.

Crew Member: any individual employee, officer, agent, independent contractor, or affiliate of the Contractor, who performs duties for the benefit of the Production for which the Contractor is

responsible including, but not limited to hair and makeup artists, wardrobe, and camera, sound and lighting engineers. To avoid doubt, Performers are not considered Crew Members.
GSP Test: Gold Standard Panel Test (or similar test approved by Gamma) that tests for HIV-1 NAT, HIV Ag/Ab, HBsAg, Anti-HCV, Chlamydia, Gonorrhea, Trichomonas Vaginalis, Syphilis, TREP-SURE EIA, and any other sexually transmitted infection or disease as required by the Producer for the Production, and dated within the previous 14 days prior to the date of Production.
Harassment: The physical, psychological, or sexual conduct of any individual involved in the Production, that has as its purpose the creation of a hostile, offensive, or an intimidating environment. Harassment may be a single incident or a persistent pattern of behavior. Harassment may include any of the following:

- Sexual pranks, repeated sexual teasing, jokes, or innuendo, whether in person, via social media, text, or email
- Verbal abuse of any nature, including but not limited to any abuse that is discriminatory and is sexual in nature, or relates in any way to sexuality, gender, race, ethnicity
- Unnecessary touching or grabbing of a sexual nature whether on or off set.
- Repeatedly standing too close to or brushing up against a person
- Repeatedly asking a person to socialize off set or giving them gifts when the person has said no or has indicated he or she is not interested
- Repeatedly making non-work related sexually suggestive gestures to a person
- Making or posting sexually demeaning or offensive pictures, cartoons, or other materials on set
- Any unwelcome conduct of a sexual nature affecting the work environment

Performer: any individual (a natural person) at least 18-years of age who consents to participate in, and be subject of, the Production.
Production: the audiovisual content (i.e. the adult-themed film production, images, video and sound recordings) which the Contractor has been engaged to produce on behalf of Gamma.
Shooting Location: a private dwelling or location used to film Productions.
Subcontractor: a natural or legal person hired by or under the direction of the Contractor and who performs duties for the benefit of the Production for which the Contractor is responsible.

To avoid doubt, neither the relationship between Gamma and the Contactor, nor the relationship between the Contractor and Performer are to be considered employment relationships, and remain solely independent contractor relationships.

3. Conduct Standards
You and your Production Team must adhere to this Code and observe the below conduct requirements at all times. You are responsible for ensuring compliance with this Code.

A.) General Conduct Standards

- Only members of the Production Team (i.e. the Contractor, Subcontractor, Crew Members and Performers) are permitted on set, unless Gamma provides written permission for a non-Production Team member in advance of the production.
- The Contractor (i.e. the third-party producer responsible for the Production) may not also act in the capacity of Performer for a Production unless (i) prior written authorization has been provided by Gamma, and (ii) a third party intimacy coordinator representing Gamma is present at the Production.

- Ensure that all Performers' Consent Checklists are communicated to the entire Production Team clearly and without ambiguity, and that all Performers acknowledge and understand such Consent Checklists.
- Ensure that everyone on set understands and agrees that a Performer may stop the Production at any time, for any reason, and that Performers and all other members of a Production Team are provided with current contact details for Gamma's talent liaison staff before a Production begins.
- Maintain a professional, honest and respectful relationship with the Production Team, acknowledging the diverse, inclusive, and sensitive nature of the Production.
- Treat the Production and all Production meetings as professional engagements, and exercise professional standards while on set, such as responding to directions given, performing duties diligently, and being respectful on set (for example, not using a mobile phone while the Production is underway).
- Ensure at least two (2) Crew Members are on set with a Performer (a Performer must not be left alone during the filming of a sex scene)
- Promptly after witnessing any incidents of Harassment or any violation of this Code, report such incidents or violations to Gamma.
- Comply with all relevant laws and regulations, acknowledging that Performers and other Crew Members share personal and other confidential information, and that health and safety precautions must be put in place to ensure a safe and secure work environment.
- Ensure that all communication between you or the Crew Members and any Performer is conducted either in a public place, or is conducted digitally if appropriate (for example, completion of paperwork).
- At Gamma's request and in relation to a specific Production, the Contractor or Subcontractor may be asked to audition a Performer to review potential alignment with a Production (i.e. asking the Performer to read lines, remove their clothing, pose in a suggestive or revealing manner, etc.). Such Performers must be cast in a non-sexual activity or light-sexual activity piece of audiovisual content, for which the Performer will receive compensation.

B.) General Prohibited Conduct

You and your Production Team (as relevant) must not:

- In relation to a Production, invite any member of the Production Team to a Shooting Location (or other private location) alone.
- Misuse power or positions of authority whatsoever.
- Engage in any Harassment whatsoever.
- Permit, offer, or demand, accept, or solicit from any Performer or other member of the Production Team, any (i) preferential treatment, (ii) coercion, (iii) personal sexual favors, (iv) gift, item of value, or influence over Production on or off set.
- Engage in sexual activity on set, unless you are a Performer and the sexual activity relates directly to the Production.
- Be under the influence of, or distribute*, drugs or alcohol (including prescription medications and medication available 'over-the-counter') (*the following may be distributed only if requested specifically: (i) Acetaminophen/Paracetamol 500mg or lower dose, (ii) Ibuprofen 400mg or lower dose, and (iii) non-drowsy antihistamine medications such as Cetirizine and Loratadine, but not Diphenhydramine or Chlorpheniramine.)
- Arrange or hold private auditions with Performers, or invite any member of a Production

Team to the Shooting Location (or any other private location) alone.

- Advertise, pitch, sell or distribute, or otherwise attempt to do so, any adult-themed projects which are not related to the Production.
- Book any Performer or hire any Crew Member who is also in a relationship with (or romantic partner of) any member of the Production Team, without prior approval of Gamma.
- Before, during and after Production share private overnight accommodations with, or travel alone with a Performer who is to appear in or has acted in the Production, without prior approval of Gamma.

C.) Expected Conduct of Performers

- Bring a minimum of one (1) valid (non-expired) piece of government-issued photographic identification (e.g. passport, permanent residence card, driver's license, state ID document) to the Shooting Location. If the Production is multi-day, this only needs to be done on the first day of production. Performers **should not** provide a credit card or Social Security number card.
- Bring GSP Test results showing 'CLEARED' to the Shooting Location. Results will be shared with all other performers before Production begins.
- Completion of all necessary paperwork before Production begins (2257 forms, release forms, etc. must be signed and dated appropriately).
- Performers must not be under the influence of, or distribute, drugs or alcohol (including prescription medications and medication available 'over the counter')
- Performers may take photographs and make any other types of recording in relation to the Production or the Shooting Location, but must cease from doing so on reasonable request of Gamma. If such photographs or other types of recording include identifiable individuals, Performers must obtain permission from the individual involved. To avoid doubt, Performers must not make any photographic or other recordings whatsoever for any commercial purpose, including but not limited to OnlyFans, Snapchat or any other similar commercial activities.
- Ensure all communication in relation to the Production is recorded or stored for future reference, including emails, text messages and other direct communications. • Promptly report any health and safety concern, or any incident or suspected incident of harassment, to Gamma's talent liaison staff.

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