

Code of Conduct



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NÜRNBERG  MESSE



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Peter Ottmann, CEO der NürnbergMesse GmbH

Dr. Thomas Koch, Senior Vice President Group Development NürnbergMesse GmbH

Why we have a Code of Conduct

Dear NMfamily,

It is our passion to connect people, create experiences, and manage knowledge. We design leading events and build powerful networks for global communities. We create value and sustainable growth. Turning ideas into values – that is our claim. We can only live up to it, if we take responsibility for our decisions and actions.

Our Code of Conduct comprises the central guidelines and requirements by which we work. It is based on our corporate values and is an essential part of our corporate culture. We always act out of the conviction that we are doing the right thing, and by doing so create trust within our company and among our customers, business partners, shareholders and other stakeholders. We deal with them fairly and in a spirit of partnership that is characterized by integrity and high ethical standards.

Actions based on values and compliance are the foundation of our business activities. Regardless of the situation, unlawful and inappropriate behavior is not acceptable to us. The provisions of this Code of Conduct are therefore binding for all NürnbergMesse employees. Together with our associated internal guidelines and operating instructions, they provide a compass for our daily work. Moreover, we strive to ensure that our suppliers, ServicePartners and their subcontractors also adhere to these principles.

Every employee is personally obliged to meet the high ethical standards set out in our Code of Conduct. We are aware that even seemingly minor violations of our Code could lead to serious consequences for our company or individual employees. These can range from damage to our reputation to fines or even imprisonment.

That is why it is the task of all of us to help identify, prevent and respond to violations. This is why we have established different ways to raise concerns and to report possible violations of the Code or related policies – including the possibility to do so anonymously. We prohibit any retaliation against employees who raise concerns, and in turn consider such retaliation a violation of our Code.

We sincerely thank you for your support.



Peter Ottmann



Dr. Thomas Koch

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Our NMfamily



Cooperation and team spirit are our keys to corporate success. By building on partnerships and innovative ideas, we have made NürnbergMesse one of the largest exhibition companies in the world. For us, dealing with each other in a responsible and trusting manner is the prerequisite for an employee-friendly, healthy and safe working environment. This respectful interaction also contributes to the motivation and development of each individual employee.

At NürnbergMesse, all employees share three fundamental corporate values:

PEOPLE. NürnbergMesse is all about people. We value partnerships and collaboration. We connect and unite individuals and organizations from all over the world by providing platforms for exchange and dialogue. As a global player, we embrace diversity, internally and externally. Openness and fairness determine the way we work – with all of our stakeholders. By building relationships based on trust, we help our partners succeed and foster the development of our employees.

PASSION. We love what we do, united through the passion for connecting people, creating experiences, and managing knowledge. In our pursuit of these aims, we are driven by engagement and enthusiasm. This commitment inspires us to approach challenges with creativity and optimism. We take ownership for our actions and responsibility for the environment and our local communities.

PROGRESS. Our purpose is advancing people's business. We take a long-term perspective in our decisions. This is why we seek to anticipate future developments and create value by offering innovative products and services. Curiosity and teamwork are our approach to continuous learning. We see ourselves as explorers and dare to think outside of the box to develop sustainable solutions for us and our partners. We dare to think outside of the box and try the new to develop sustainable solutions for us, our partners and society at large.

Our corporate values are the foundation of our corporate culture and guide our strategy, our actions and the decisions we make.

Our corporate values were jointly developed by our NMfamily and are expressed in our behavior every day. As our inner compass, they determine how we interact with all our stakeholders – from employees to exhibitors, from shareholders to visitors. Our values reflect the unique blend of qualities found in each member of our corporate family. We are convinced that an environment shaped by these values is the best breeding ground for continuous development and innovative solutions.

For us, our values are the heartbeat of our company.



1.1

Diversity and inclusion

For us, diversity and equal opportunities are essential and thus of strategic importance. A diverse workforce and an open corporate culture are important success factors for our company. To us, diversity also means considering and supporting the different skills, knowledge, perspectives, experiences and characteristics of our employees. By doing so, it is our aim to support their personal development and to bring out their respective strengths to promote creativity, innovation, and our business success. For this reason, we particularly seek to strengthen awareness of cultures, „mindsets“ and generations.

1.2

Preventing discrimination and harassment

We do not tolerate **discrimination**¹ or **harassment**² of employees, business partners, customers or other stakeholders.

We do not treat any person unfairly or in a biased manner, particularly not because of a specific identity, handicap or characteristic such as ethnicity, color of skin, age, gender identity, handicap, sexual orientation, talent, religion or other attributes.

Nor do we debase others or meet them in a hostile manner. We therefore do not make or disseminate derogatory or discriminatory statements. We refrain from sexual harassment and unwanted sexual advances without exception.

We openly address and strongly counteract cases of discrimination or harassment, including sexual or **sexualized harassment**³, and report them to the Compliance Officer.

¹ Any form of unjustified discrimination or unequal treatment of individuals or groups on the basis of various perceivable or non-perceivable characteristics.

² Refers to verbal or physical behavior that debases a person or expresses hostility or aversion toward a person, e.g. derogatory statements, jokes, taking photos and forwarding them.

³ Includes any unilateral and undesirable behavior of a sexual nature that violates the dignity of the person concerned, catcalling, publishing or sending pornographic or sexist images, sexual innuendos, obscene jokes, gestures and comments.



2

Our social and environmental responsibility

We incorporate social and ecological aspects into our business activities in a holistic way. For us, acting sustainably is a vital component of our social responsibility and a building block for maintaining and strengthening the foundation of our business.

Our sustainability strategy is consistently aligned to the United Nations Sustainable Development Goals (UN SDGs) as the leading international framework for sustainable development. We design our products and services under consideration of sustainability aspects in order to contribute to the transition to a low-carbon economy and the careful use of natural resources.

In our daily activities as well as internal and external stakeholder relations, we are guided by the UN Global Compact. In accordance with its ten principles, we commit ourselves to promoting human rights, labor standards, environmental protection and fair competition. The Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization, and the principles of the Rio Declaration on the Environment and Development are our basis for doing so.

2.1

Human rights

NürnbergMesse fully respects internationally recognized human rights. For us, this implies actively opposing modern slavery and human trafficking, including child and forced labor, in our own business as well as our supply chain.

We require all our employees to behave fairly and lawfully towards coworkers, our business partners, exhibitors and visitors. We thus commit ourselves to respect and promote the protection of international human rights. In addition, we work to ensure that our suppliers, ServicePartners and their subcontractors also adhere to these principles.

2.2

Occupational safety and health management

Our physical and mental health is the foundation for our success and our productivity. We adhere to occupational health and safety standards concerning the workplace as well as the organization of work. In this context, compliance with working hours and breaks is of particular importance to us. We also create a safe working environment wherever we do business and comply with all applicable laws and regulations on employee health and safety. All of our employees are required to use necessary safety equipment whenever necessary and to address unsafe working conditions immediately, in case this can be done without endangering themselves. In other cases, potentially unsafe working conditions must be reported to the contact person for occupational safety and health management.

To promote health, we offer occupational health management for our employees. Our company physician supports us in creating good working conditions and in planning and implementing occupational preventive screenings. Trainings and instructions on occupational safety as well as appropriate tools for prevention round off our range of services.

Continuous consulting and services for our employees are another integral element in ensuring a healthy work-life balance. For this purpose, we provide attractive working time models.



2.3

Environmental protection

It is not possible to operate successfully in economic terms without acting in an ecologically sustainable manner. As an exhibition company with extensive real estate and international business activities, we bear a special responsibility in this regard. Protecting the environment and the climate as well as carefully using natural resources are central components of our operations.

We exploit the potential for reducing emissions and conserving natural resources by actively promoting alternative energies. For that purpose, we have designed our own battery storage-based photovoltaic system with second-life battery storage, procure regionally, and provide recyclable trade show booths. As we operate large properties, the sustainable design of our exhibition halls is also of particular importance to us.

We expect our employees to play an active role in protecting the environment and climate – entailing the careful use of energy and water as well as the avoidance and separation of waste wherever possible. We strongly support proactive behavior and suggestions for improving our energy and environmental management. This also applies to our events, which we increasingly want to use as platforms for sustainability topics in order to promote exchange and cooperation between different stakeholders.



3

**Our
principles
for corporate
conduct**

We shape our corporate behavior in a long-term and sustainable manner, together with our exhibitors, business partners and suppliers. In order to put our business relationships on a stable and legally reliable basis, we consistently adhere to our principles for dealing with gifts and invitations. We respect the prohibition of corruption and avoid conflicts of interest. We strengthen free competition and strictly comply with the prohibition of money laundering and applicable tax laws.

3.1

Cooperation with exhibitors, partners and suppliers

We engage in dialogue with our exhibitors, business partners, and suppliers worldwide and share with them our principles on ethical behavior, compliance with legal standards and environmentally friendly behavior. We expect them to base their actions on the same principles.



3.2

Gifts and invitations

- **Business Relationships**

Within business relationships, gifts and invitations are customary and permitted to an appropriate and socially adequate extent. Such gifts are inappropriate in cases, where a certain return is demanded or the recipient is influenced. Acceptance of gifts must therefore never lead to dependence on the giver. We reject such inappropriate gifts in order to protect ourselves and to give the business partner the opportunity to save face. We never actively solicit personal benefits in our dealings with business partners, customers and public officials. We do not give or accept cash or other forms of payment.

The acceptance or distribution of promotional goods is permitted. To provide orientation, the magnitude of what we generally consider appropriate and socially adequate is a value of up to 40 Euros. However, we always keep in mind which impression can be created due to certain external circumstances and the overall situation. If the value of 40 euros is exceeded, the transaction must always be disclosed and documented via our internal tool „Mobilexpense“. If we have doubts about the appropriateness of the gift or invitation, we confer with our direct supervisor or the Compliance Officer on a case-by-case basis

- **Public officials**

By law, gift giving to public officials is strictly restricted. There are severe penalties for companies and individuals who violate the respective regulations. Therefore, even the general cultivation of business relationships by giving gifts and benefits to public officials is prohibited. Even on special occasions, such as anniversaries, gifts to public officials must be limited to low-value gifts in the form of promotional items.

3.3

Prohibition of corruption

We do not accept **corruption**⁴, do not bribe and do not accept bribes ourselves. We achieve our economic success through our diverse portfolio of events and not by unduly influencing our business partners and customers. Our decisions are based on objective and plausible reasons.

We are also aware that corruption entails numerous risks and can have consequences for NürnbergMesse and the individuals involved. These include **loss of reputation**⁵, weakening of competitiveness, distortion of competition, as well as civil and criminal liability.

We therefore never abuse influence entrusted to us for private gain or to our advantage. We actively counter corruption with measures such as the two-person rule in decision-making, transparency of decisions and appropriate selection of employees.

We reject bribery attempts and report them immediately. We take any indications of actual or attempted corrupt behavior seriously and forward them to the Compliance Officer.

⁴ Abuse of an office or professional position to obtain an advantage (e.g. bribery).

⁵ Sustained damage to the image of a company.



3.4

Conflicts of interest

Our personal interests or the personal interests of a third party must not affect the interests of NürnbergMesse or the interests of our exhibitors, business partners and suppliers. It is very important to us that we do not enter into any conflicts of interest or loyalty.

We take our business decisions exclusively based on objective criteria and do not allow ourselves to be influenced by personal interests and relationships.

The risk of conflicts of interest particularly exist when we award contracts to **related parties**⁶ or to companies in which related parties work in significant positions or hold ownership. The same applies in the case of private commissioning of NürnbergMesse ServicePartners.

Second jobs for competitors or business partners of NürnbergMesse and the exchange of business-related information with related persons working for competitors also harbor the risk of conflicts of interest. We report particularly these activities to the Compliance Officer in advance and have them confirmed in writing by the Compliance Committee – provided there is no conflict of interest.

⁶ For example, spouses, partners, relatives, friends and private business partners.

3.5

Free competition

Fair and functioning competition is a basic premise for our economic system. We are thus committed to protecting fair competition and comply with applicable antitrust and competition laws. We do not enter into any arrangements with competitors and do not engage in any unfair coordination with regard to prices, conditions or tenders. We also avoid product and territorial allocations or divisions.

3.6

Prohibition of money laundering

Money laundering is the infiltration of illegally generated monies into the legal economic cycle. We therefore only do business with reputable business partners and suppliers who are engaged in legitimate business activities. In addition, we are committed to combating money laundering and comply with all applicable national and international laws.

3.7

Tax payment and transactions

Due to its national and international activities, NürnbergMesse is subject to a wide range of tax regimes that must be observed. Violations of these regimes lead to legal and reputational risks.

We fulfill our tax obligations and consistently counter tax evasion. For that purpose, NürnbergMesse has implemented a Tax Compliance Management System („Tax CMS“) for the areas relevant for taxation.

We involve our tax department in all tax-relevant matters. These include, in particular, statutory changes, commencement and modification of business activities domestic and abroad, reports of tax-relevant errors found during controls, changes to tax-relevant processes, and reports of necessary training on tax issues.

We document all business transactions correctly and in due time. This implies the complete and unaltered reproduction of the relevant information and content. We archive relevant documents and receipts in accordance with the requirements. We immediately report any requests to falsify the recording of information or to arrange dubious transactions.

4

**Our handling
of data and
information**

We protect the data and information of our company and of our employees, exhibitors, visitors, business partners and suppliers. For us, the trust of our employees, exhibitors, visitors, business partners, suppliers and interested parties is paramount. Therefore, we are aware of our responsibility concerning the processing of personal data. Personal data is any data relating to an identified or identifiable natural person, such as names, addresses, marital status, date of birth and photographic images. This data may only be collected for specified, explicit and legitimate purposes that are connected to our business-related activities.

Our data protection guideline is the binding basis for legally compliant handling and enduring protection of all personal data processed within NürnbergMesse.

Appropriate instructions and trainings as well as further information are provided by our “Legal Services, Compliance & Insurances” department and the external data protection officer of NürnbergMesse.

If we become aware of actual or potential breaches in the area of data security or data protection or suspect such breaches, we report them immediately.

4.1

Data protection and IT security

Our IT security protects our digital assets – the company’s data – from loss, unintentional modification, and destruction. It includes both technical and organizational measures.

Appropriate instructions and trainings as well as information on current threat situations are provided by the „Technology & Operations” department and the external data protection officer of NürnbergMesse. Resulting requirements and recommendations for action are fully observed by us.

Early reporting of malfunctions, anomalies, incidents, irregularities and events relevant for security helps to keep greater damage away from NürnbergMesse.

If, for example, IT services do not function adequately or unauthorized third parties have obtained company data, we report these events immediately and directly to the IT hotline. We already report the suspicion of an incident.

In the case of a security incident, the report is then forwarded to the “Technology & Operations” department or the “Legal Services, Compliance & Insurances” department.

4.2

Social Media

Social media are used for networking and exchange with our customers. They are playing an increasingly important role in public dialog, which is why we also use social media channels for communication, information and customer retention purposes.

When we are active on social media, we pay attention to the quality of our posts, separate opinions from facts, and respect the law. Also in this regard, we act in a responsible, transparent, authentic, polite and respectful manner. Under no circumstances do we make negative or even hurtful comments about other people from inside or outside of NürnbergMesse.

We do not disregard the rights of users or the rights of third parties not involved (e.g. copyright and personal rights, privacy, data protection). In the event of unclear or disputed content, we always contact Corporate Communications in advance.

In the name of NürnbergMesse, we only share contributions that have been approved for publication and do not harm NürnbergMesse or third parties. We strictly observe the prohibition of sharing company and business secrets as well as the prohibition of disseminating statements that are harmful to the company.





5

Our accountability

Only if rules and norms are observed, we can prevent against damage to NürnbergMesse. Compliance with the Code of Conduct is the responsibility of each individual employee. We expect that any justified suspicion of violations or potential violations will be reported.

5.1

Reporting violations

When you have obtained information about violations, these are to be reported internally to our department in charge. Information in this context includes, for example, justified suspicion or knowledge of actual or potential violations that have already been committed or are very likely to be committed. This also entails the attempted or actual **concealment**⁷ of such violations. Moreover, a violation may consist not only of an action, but also of an **omission**⁸.

Only the Compliance Officer and his deputy (Internal Audit) have access to the information communicated via these reporting channels in order to protect the integrity and anonymity of those who report violations.

⁷ Intentionally misleading someone to hide real facts.

⁸ Not carrying out a mandatory action, such as a violation of reporting or documentation obligations.

5.2

Dealing with violations

The Compliance Officer follows up on all tips and acknowledges their receipt within seven days. The whistleblower will receive feedback on the follow-up actions taken and planned within three months of receipt. The highest level of confidentiality, impartiality and fairness is ensured in connection with their processing. Our aforementioned reporting channels permit a highly confidential dialogue between the whistleblower and our Compliance Officer. Our digital whistleblowing system (hintbox.nuernbergmesse.de) also allows anonymous reports, including an option to communicate with the anonymous whistleblower. A report made in good faith as to the accuracy of the information will not be considered a breach of trust and will never lead to adverse measures or sanctions.

5.3

Evaluation and review of one's actions

When faced with situations where you are unsure of what to do, these seven questions can be helpful:

1. Is my behavior in compliance with the law?
2. Does my conduct comply with the requirements and guidelines of NürnbergMesse?
3. Is my conduct not based on a personal conflict of interest?
4. Can I be sure that my decision or action will not harm or unduly disadvantage a colleague or business partner?
5. Would it be possible without restrictions to report my decision to the outside world and the public becoming aware of it?
6. Can I justify my decisions or actions without having to lie or bend the truth?
7. Does my behavior help to protect the good reputation of NürnbergMesse as a responsible and sustainable company?

If you can answer „yes“ to these seven questions, your conduct is very likely in line with our Code of Conduct.



5.4

Help and support with questions

If there are any questions about the Code of Conduct or doubts regarding situations or incidents that may relate to any area dealt with in the Code of Conduct, we always ask you to seek advice from the Compliance Officer.

The Code of Conduct cannot cover every conceivable constellation or situation. Our Compliance Officer will therefore be happy to answer any question, no matter how seemingly unimportant, and will work with you to find a solution.

Further information on compliance topics is also available on our NMInside channel „Compliance“.

If you have any other questions, please do not hesitate to contact our contacts at NürnbergMesse.



6

Questions and answers

1. Why is the new Code of Conduct important for me?

The NürnbergMesse Code of Conduct contains the principles of our business actions. It sets the limits for company specific as well as legal requirements, and thus does not only serve to protect NürnbergMesse, but also each individual employee.

2. What happens if we do not comply with the Code of Conduct?

Even a seemingly harmless violation of our Code of Conduct could have serious consequences for NürnbergMesse or individual employees. The respective consequences range from a damage to reputation to fines or imprisonment. In individual cases, the violation could also have consequences for the employee. In the worst case, it could even result in the termination of employment.

3. Could reporting a violation or possible violation of the code create the impression that I try to personally benefit from such behavior?

We fully support whistleblowing. If you are concerned that your report may be perceived as an attempt to gain a personal advantage, you can use the anonymous whistleblower system at any time. If in doubt, always ask the Compliance Officer for advice.

4. Negotiations with various suppliers are pending. The managing director of a supplier is related to me. Can I award the contract to him without any problems if he submits the best offer?

The personal relationship with the managing director must be reported to the Compliance Officer for assessment and further action. It is also possible to inform the manager in charge, who will in turn inform the Compliance Officer of the matter. Provided there is no apparent conflict of interest, the compliance Committee confirms in writing that the contract can be awarded to the supplier in question.

5. Trainees of NürnbergMesse are harassed by a visitor at an exhibition event. I observe the incident. What should I do?

If the situation seems strange to you or it is clearly harassment from your point of view, then intervene. But please do not put yourself in danger. Sometimes it is enough to verbally confront the perpetrator and thus discourage further harassment. If this is not enough or the situation is too dangerous for you, get help. Inform the security service of NürnbergMesse. It would also be possible to approach the trade fair visitor with the help of the security service and help the trainees. The incident should also be reported to the Compliance Officer afterwards.

6. A colleague makes a joke about a new colleague with an immigrant background. The joke was not directed at me, but I still found it condescending and insulting. However, I did not comment on it. How should I have behaved?

Even if there are no bad intentions behind a joke, such behavior is not acceptable as soon as it makes another person feel bad or the joke could be understood as malicious. The correct thing to do would be to point out to the colleague that the joke was offensive or could be perceived as such. Depending on the situation and on what happens next, the incident can also be discussed with the manager in charge and/or be reported to the Compliance Officer.

7. A supplier wants to invite me to the Oktoberfest. I really want to go, as I have never been to the Oktoberfest before. Would that be possible?

Please always question whether such an invitation is appropriate and could be bound to a favor in return. You can use our guidelines on gifts and invitations above and the established value limits to identify the respective criteria and check whether approval from your manager and/or the Compliance Officer is necessary. If you are still unsure, please contact the Compliance Officer.

8. May I share personal data with our business partners?

In principle, this is possible. At this point, it must be checked in particular whether and which data protection agreements must be concluded for this purpose. You can check the respective prerequisites based on our data protection policy. If you are still in doubt or uncertain, please contact the person in charge of data protection from our „Legal Services, Compliance & Insurances“ department.