

COMPLIANCE POLICY



JUNE 2024

Index

I.- INTRODUCTION	3
II.- OBJECTIVES OF THE CORPORATE COMPLIANCE PROGRAM	3
III.- SCOPE OF THE CORPORATE COMPLIANCE PROGRAM.....	4
IV.- FIRA'S COMPLIANCE FUNCTION	5
V.- ETHICAL CHANNEL	5
VI.- COMMITMENT TO ETHICAL AND REGULATORY COMPLIANCE	6

I.- INTRODUCTION

FIRA INTERNACIONAL DE BARCELONA and its investee companies, FIRA BARCELONA INTERNATIONAL EXHIBITIONS AND SERVICES, S.L.U., ALIMENTARIA EXHIBITIONS, S.L.U., FIRESA LOGISTIC, S.L., FIRA CCIB, S.L.U. and FIRA CIRCUIT, S.L.U. (hereinafter **FIRA** or the Organization, indistinctly) have implemented a Corporate Compliance Program in order to highlight their commitment to ethical and regulatory compliance, as well as to minimize and control the likelihood of committing criminal acts within the Organization.

Specifically, the Corporate Compliance Program is a set of internal regulations that **FIRA** implements for the purpose of complying with the legal-criminal regulations on the subject and, in short, to make clear the ethical and compliance position that the Organization maintains in the development of its activities.

Thus, the Corporate Compliance Program establishes a series of principles and guidelines for action that **FIRA** and its Collaborators must respect and comply with at all times.

This Compliance Policy should serve as an ideal tool for the Organization's Collaborators and persons who have a relationship with **FIRA** to be able to verify **FIRA**'s Compliance objectives.

II.- OBJECTIVES OF THE CORPORATE COMPLIANCE PROGRAM

In addition to the principles of action established in the Ethical Code, which **FIRA** Collaborators must know and apply in their daily work, the main objectives of the Corporate Compliance Program are the following:

- Promote a culture of ethics and regulatory compliance at **FIRA**.
- Define a zero tolerance position with respect to the commission of crimes.
- Establish control measures for the prevention of crimes.
- Maintain a relationship based on ethics and regulatory compliance with all **FIRA** Collaborators and with third parties with which the Organization has relations.
- To carry out training actions for all **FIRA** Collaborators in matters of ethical and regulatory compliance.
- Review, update and permanently adapt the Corporate Compliance Program.

III.- SCOPE OF THE CORPORATE COMPLIANCE PROGRAM

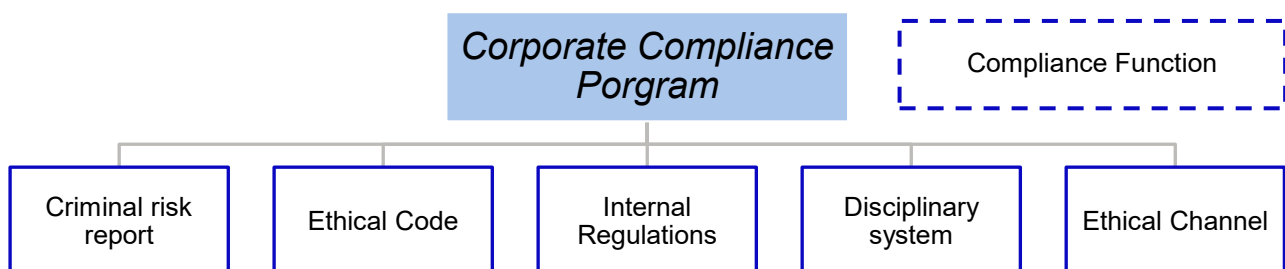
In general, the Corporate Compliance Program is developed on the basis of the characteristics and purposes that inspire the business and institutional activity of **FIRA** and is mandatory for any of its Collaborators, regardless of their office or position. Furthermore, in view of the specific characteristics of their relationship, some elements of the Corporate Compliance Program may be extended to certain third parties, whether natural or legal persons, who maintain commercial, institutional or other types of links with **FIRA**.

The main body responsible for supervising the promotion and operation of the Corporate Compliance Program is **FIRA's** Ethics and Compliance Committee. However, each FIRA Collaborator is equally responsible for its compliance.

It should also be noted that **FIRA's** Compliance Function also includes a Compliance Officer who, in addition to chairing the Ethics and Compliance Committee, ensures the correct management, development and implementation of the Corporate Compliance Program on a day-to-day basis. In the case of FIRA CCIB, S.L.U. and FIRA CIRCUIT, S.L.U., the Ethics and Compliance Committee has the respective Compliance Managers.

The Corporate Compliance Program is intended to ensure compliance with current legislation within the framework of **FIRA's** activities, but also to acquire an ethical commitment to collaboration.

Specifically, **FIRA's** Corporate Compliance Program is composed of:



IV.- FIRA'S COMPLIANCE FUNCTION

As previously introduced, the Compliance function in **FIRA** is mainly carried out by the Ethics and Compliance Committee and the Compliance Officer and, in the case of FIRA CCIB, S.L.U. and FIRA CIRCUIT, S.L.U., the respective Compliance Managers.

The Ethics and Compliance Committee has been assigned:

Independence.

- Authority.
- Adequate competence.
- Direct and immediate access to **FIRA's** governing bodies and senior management.

Thus, **FIRA's** Ethics and Compliance Committee is internally responsible for supervising the operation of the Corporate Compliance Program, ensuring that its content is adequate and promoting its compliance, with the Compliance Officer performing these functions on a day-to-day basis.

With this, the Compliance function aims to promote the improvement of the Corporate Compliance Program and report its results to **FIRA's** governing bodies.

Collaborators should contact the Ethics and Compliance Committee, through the Ethical Channel, in case of any doubts about how to act, as well as to communicate any relevant fact or improvement.

V.- ETHICAL CHANNEL

The Ethical Channel is the means that **FIRA** makes available to its Collaborators to communicate to the Ethics and Compliance Committee any non-compliance or doubt in relation to the Corporate Compliance Program. Specifically, the Ethical Channel must be used to communicate:

- Any breach of the Ethical Code or other internal regulations, processes and controls that make up the Corporate Compliance Program.
- Any violation of current applicable legislation.

- Any contingency that could pose a risk to **FIRA's** reputation.
- Doubts and queries regarding the development and application of the Corporate Compliance Program.

This channel is located on an external platform accessible from the following link:

<https://firabarcelona.integrityline.com/setup>

Any Collaborator who becomes aware of a possible breach must immediately report it through the Ethical Channel, providing as much information as possible regarding the facts about which the communication refers, as well as the identity of those responsible and the date on which they occurred.

The Ethical Channel is a totally confidential channel and it is guaranteed that the person who has reported a violation will not suffer any retaliation, provided it is used in good faith. **FIRA's** Ethical Channel can be used anonymously.

Collaborators should bear in mind that they are not acting in **FIRA's** interest when they conceal a fact or incident that violates the Law or the Ethical Code.

Communications made in bad faith, knowing them to be false or with the intent to harm a colleague or superior will be subject to disciplinary action, without prejudice to possible criminal liability.

More information regarding the guarantees of the Ethical Channel, as well as the rights and duties of Collaborators in relation to this channel and the procedure for internal investigations can be accessed through the **Terms of use of the Ethical Channel**, available through the following [link](#).

VI.- COMMITMENT TO ETHICAL AND REGULATORY COMPLIANCE

FIRA, as a public entity of a consortium nature, carries out its institutional and business activities in accordance with the requirements of ethical and regulatory compliance. In this sense, respect for all the **values and principles of action established in the Organization's Ethical Code** is part of **FIRA's organizational culture**. Thus, each of the Collaborators who form part of **FIRA** accept these values and principles as their own, extending them to all third parties with whom they maintain institutional or business relationships.

Also part of **FIRA's organizational culture** is respect for **compliance with current legislation and the technical procedures** voluntarily assumed by the Organization. In terms of ethical and regulatory compliance, this commitment implies that each and every **FIRA** Collaborator must endeavor to avoid any conduct or activity that involves a breach of current legislation.

FIRA requires all its Collaborators to **comply with the applicable regulations** in their respective areas of activity in the development of their activities. In addition, Collaborators must also **promote** an organizational culture aligned with ethical and regulatory compliance with third parties with whom they maintain institutional or business relationships.

In any case, **the prohibition of committing criminal acts** through or on behalf of **FIRA** applies to any Collaborator of the Organization, regardless of their position or function. Failure to comply with any of the provisions established in the Corporate Compliance Program will be subject to a sanction proportionate to the seriousness of the act and in accordance with the applicable labor or administrative regulations and the applicable Collective Bargaining Agreement.

FIRA will actively apply policies that promote a good working environment, a culture of prevention and that contribute to preventing situations that deteriorate it. Likewise, **Collaboration, cooperation and trust** will be encouraged and strengthened in the relations between the different levels and units of **FIRA** and among its Collaborators.

FIRA understands that the **prevention of criminal risks and other irregularities is not a one-time activity**, but a permanent and constantly evolving one. To this extent, the Corporate Compliance Program is active and is reviewed periodically. Therefore, **FIRA** is committed to developing, reviewing and continuously improving all the policies, procedures and processes that make up the Corporate Compliance Program.

If we have any doubts about how we should act in a given situation, we should consult the Ethics and Compliance Committee through the channels established for this purpose.

DOCUMENT COMPLIANCE TRACKING INFORMATION

Document identification	Compliance Policy.
Document category	High-level regulations.
Entities to which it applies	FIRA INTERNACIONAL DE BARCELONA and its investee companies, FIRA BARCELONA INTERNATIONAL EXHIBITIONS AND SERVICES, S.L.U., ALIMENTARIA EXHIBITIONS, S.L.U., FIRESA LOGISTIC, S.L., FIRA CCIB, S.L.U. and FIRA CIRCUIT, S.L.U.
Approvals by the Executive Committee	12.06.2024
Approvals by the Board of Directors or acknowledgment*	09.07.2024
Adhesion of the Board of Directors of FIRA CIRCUIT, S.L.U.	19.09.2024
Last revision carried out	04.06.2024