

ETHICAL CODE



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I. INTRODUCTION

Article 1. Purpose

The Ethical Code of FIRA INTERNACIONAL DE BARCELONA and its investees: FIRA INTERNATIONAL EXHIBITIONS AND SERVICES, S.L., ALIMENTARIA EXHIBITIONS, S.L.U., FIRESA LOGISTIC, S.L., FIRA CCIB, S.L.U. and FIRA CIRCUIT, S.L.U. (hereinafter "**FIRA**" or the "Organisation" indistinctively) should serve as a guide for the activity of their Collaborators in the course of their professional duties.

In doing so, by means of this Ethical Code **FIRA** shows its willingness and commitment to do things right, and to use this tool of great value to help all Collaborators of the Organisation make better decisions from an ethical perspective and compliance at all times.

This Ethical Code is the basis on which **FIRA** build their ethical culture and effective corporate compliance, a culture which falls to all Collaborators of the Organisation.

The Ethical Code includes **FIRA**'s commitment to the principle of due diligence for the prevention and detection of unlawful activities in all its areas of action, establishing a set of principles of conduct and guidelines designed to ensure the ethical and professional behaviour of all **FIRA**'s Collaborators in the conducting of their activity and in their relations and interactions with other partners, customers, suppliers, market competitors, the Public Administrations and the business environment in general.

Article 2. FIRA's commitment

FIRA has a clear commitment to sustainable development, to the creation of social value and the generation of wealth for Barcelona and its surroundings. The Organisation supports the industry and turns innovation into a tool for change. This commitment is closely linked to **FIRA**'s, business model, as well as to the development of its activity and the management of its resources.

To this end, **FIRA** focuses its efforts on contributing to the Sustainable Development Goals (SDGs), adapting its strategy to them and seeking to make this commitment extensive both to exhibitors and visitors.

Based on this commitment, **FIRA** shares the following values:

- **Respect for people:** respect for all people who interact with **FIRA**, whether as Collaborators, exhibitors, visitors, among others, is a fundamental principle of **FIRA**'s, corporate ethical culture.
- **Positive economic and social impact:** **FIRA**, with its activity, seeks to promote the industry and knowledge, the development of the urban dimension and the brand of the city of Barcelona and, finally, to support young talent.
- **Promotion of sustainability and respect for the environment:** **FIRA** is committed to sustainability, environmental protection, and the fight against climate change. The Organisation works to reduce the impact of its activity, betting on energy efficiency, renewable energies, recycling, and the circular economy.
- **Solidarity:** **FIRA**, in their operating, collaborates with a number of institutions and entities that work to fight social exclusion, supporting solidarity initiatives and collaborating in them through its facilities and assets, as well as with the help of its Collaborators.
- **Innovation:** to **FIRA** innovation is an essential tool to promote sustainable development initiatives. Innovation is part of the DNA of **FIRA**'s, fairs and events, which are a great area for presenting and spreading all kinds of advances.
- **Responsibility:** **FIRA** and its Collaborators assume a daily commitment to act at all times in a responsible manner, aspiring to act in an ethical manner that goes beyond strict compliance with the regulations that are applicable to the Organisation and its activities.
- **Excellence:** **FIRA** is one of the most important trade fair organisations in Europe, owing to the volume and quality of its events, its quality venues and its organisational experience and professionalism. In this sense, **FIRA** seeks to offer excellence in each and every one of the services and products offered to visitors and exhibitors.

Article 3. Scope of application

The principles and guidelines of conduct contained in this Ethical Code are applicable to all **FIRA** Collaborators, regardless of their hierarchical level, the nature of their contractual relationship, their geographical or functional location or **FIRA**'s subsidiary entity in which they provide their services.

For the purposes of this Ethical Code, **FIRA**'s Collaborators are any persons holding a labour relationship with the Organisation to work in the same (i.e. employees and officers) as well as anyone working with **FIRA** by means of an internship programme or a Temporary Employment Agency agreement. Furthermore, the Ethical Code may also apply to other persons if expressly established in the contractual relationship regulating their relationship with the Organisation.

FIRA undertakes to publicize and circulate this Ethical Code so that it is known and respected by all its Collaborators. In this regard, the Code will be sent to all **FIRA**'s Collaborators, who must formally assume their undertaking to comply with it.

FIRA will promote the adoption of principles of action consistent with those contained in this Ethical Code and the internal regulations developing it among its contractors.

Article 4. Interpretation of the Ethical Code

The principles of conduct contained in this Code do not seek to include all the situations or circumstances **FIRA** Collaborators may find themselves in, but to establish the general principles of conduct which should govern the way in which they act during the course of their professional activity.

The Compliance Officer is the internal officer in charge of, among other, the interpretation of the Ethical Code. His/her interpretative criteria are binding for all **FIRA** Collaborators.

Any doubts which may arise among **FIRA** Collaborators regarding the interpretation of this Ethical Code should be addressed to the said officer by using the Ethical Channel of the Organisation.

II. GENERAL STANDARDS OF PROFESSIONAL CONDUCT

Article 5. Legal compliance

All Collaborators are responsible for understanding the laws, regulations and standards relevant to the exercise of their duties and responsibilities which may affect their working area.

FIRA Collaborators will strictly comply with the legislation in force in the place where they carry out their activity, in keeping with the spirit and purpose of the standards, and

will abide by the provisions of this Ethical Code and the protocols regulating **FIRA**'s activity.

Similarly, they will fully abide by the obligations and commitments assumed by **FIRA** in its contractual relations with third parties in the exercise of their duties and responsibilities.

It is the duty of all **FIRA** Collaborators to inform the Compliance Officer of the initiation, development and outcome of any legal, criminal or administrative proceeding involving sanctions in which a professional has been processed, incriminated or investigated when it may potentially affect him or her in the exercise of his or her professional duties or damage **FIRA**'s image or interests.

Article 6. Engagement in ethical and professional conduct

The guiding principles the behaviour of **FIRA** Collaborators will abide by will be integrity, professionalism and efficient use of **FIRA**'s resources:

- Integrity means fair, honest and objective activity conducted in good faith and in keeping with **FIRA**'s interests without, on any account, seeking one's own or a third party's benefit by means of the improper use of a position within the Organisation.
- Professionalism means diligent, responsible, and efficient activity.
- The efficient use of **FIRA**'s resources means their use in a suitable, rational, sustainable, and effective manner, avoiding improper appropriation or use.

FIRA expects integrity and professional behaviour from all its Collaborators in the performance of their duties.

III. EMPLOYEES

Article 7. Respect for people

FIRA respects the principles of the Universal Declaration of Human Rights of the United Nations and the declarations of the International Labour Organization and is committed to the prevention of discrimination based on race, colour, nationality, social origin, age, gender, marital status, disability, sexual orientation, ideology, political opinions, religion or any other personal, physical, or social condition of its employees, as well as equal

opportunities. In this context, **FIRA** undertakes to keep a work environment free from any discrimination and from any conduct implying harassment.

FIRA rejects any manifestation of violence, physical, sexual, psychological, moral, and other forms of harassment, abuse of authority at work and any other intimidating or offensive conduct with regard to the personal rights of its Collaborators.

FIRA will conduct a strict and objective selection programme, focusing exclusively on the candidates' academic, personal, and professional merits and **FIRA**'s requirements, strictly complying with the applicable legislation on employee recruitment and social security.

FIRA guarantees the application of the principle of equal treatment and opportunities within its recruitment processes, professional promotion, labour conditions, including those connected to pay and redundancies, affiliation and participation in trade union and corporate organisations. In this context, **FIRA** guarantees its Collaborators' right to belong to trade union organisations and to not undertake any kind of reprisal for participating in their activities.

FIRA and all its Collaborators will respect the internationally recognised rights of syndication, association and collective bargaining, as well as the activities conducted by organisations representing the workers, in accordance with the duties and competences legally attributed to them, maintaining a relationship based on mutual respect with a view to promoting an open, transparent and constructive dialogue to consolidate the objectives of social peace and job stability.

Last, within the communications activity scheme of **FIRA**, **FIRA** shall refrain from spreading messages which may, whether directly or indirectly, be deemed as hate speech.

Article 8. Personal data

FIRA shall process data in accordance with the regulation on the protection of personal data. On such basis, the Organisation undertakes to not disclose the personal data of its Collaborators, save as with the consent of the interested parties or in the event of a legal obligation or the need for compliance with legal or administrative resolutions. On no account may Collaborators' personal data be used for purposes other than those legally or contractually provided for.

FIRA Collaborators who, due to their activity, access **FIRA**'s personal databases and become aware of the personal data of other Collaborators shall keep any such data confidential.

Article 9. Occupational health and safety

FIRA has an occupational health and safety programme and takes the preventive measures established in this regard in the current legislation and any others which may be established in the future. The Organisation undertakes to update the measures on the prevention of occupational hazards, as well as to strictly respect the applicable regulations in this matter.

All **FIRA** Collaborators must understand and comply with the occupational health and safety standards affecting them, in order to prevent and minimise occupational hazards and to ensure the safety of themselves and any person who may be affected by their activities. The Organisation shall inform the staff coming from Temporary Employment Agencies, by means of the said Agencies, on the said standards so that they become aware of their responsibilities in matters of health and safety.

FIRA will promote that the partner companies and contractors operating with **FIRA** comply with its standards and programmes in any matters of occupational health and safety affecting them. The Organisation will use all the means at its disposal to inform said partners and contractors of all the standards and programmes governing **FIRA** in relation to this matter.

In this sense, as proof of due notification, all **FIRA** partners and/or contractors must sign the current internal operational regulations related to occupational health and safety.

Article 10. Resources and means for conducting professional activity

FIRA undertakes to provide its Collaborators with the necessary and suitable resources and means to conduct their professional activity.

Notwithstanding mandatory compliance with the **FIRA**'s specific standards and protocols regarding resources and means, **FIRA** Collaborators undertake to make sensible use of the resources and means at their disposal, assigning them to strictly professional purposes.

In exceptional circumstances, they may be used for personal purposes, in accordance with the internal standards and protocols.

Therefore, they will not generate any expectation of privacy in the event that they have to be supervised by **FIRA** in the proportionate performance of their control duties, when there are indications of irregularities or as a result of a legal obligation. In any case, the control means shall be strictly proportionate based on each situation and in accordance with the regulations and the case-law as may from time to time apply.

The use of the equipment, systems and computer programmes provided by **FIRA** to its Collaborators for the performance of their work, including ease of access to and operation of the Internet, must comply with the criteria of professionalism, security and efficiency, excluding any computer use, action or function which is unlawful or contrary to **FIRA**'s standards or instructions.

Collaborators shall not use, reproduce, replicate or assign **FIRA**'s computer systems or applications. Similarly, Collaborators will not install or use programmes or applications not authorised by **FIRA** in the computer equipment.

Article 11. Processing and confidentiality of information

Generally speaking, non-public information owned by **FIRA** shall be deemed confidential information; it will be subject to professional secrecy and its content may not be provided to third parties.

Also, **FIRA** respects the data of clients, contractors and third parties in general. Thus, in the course of the Organisation's activities the principles of confidentiality and privacy shall govern.

It is **FIRA**'s responsibility and that of all its Collaborators to provide sufficient security measures and apply the established procedures to protect confidential information recorded in any physical or electronic format against any internal or external risk of unauthorised access, handling or destruction, whether intentional or accidental.

If there are any doubts with regard to the confidentiality or otherwise of the information, **FIRA** Collaborators must deem it as confidential and check on its nature with their hierarchical manager, and, where necessary, with the Compliance Officer.

Any reasonable indication of leakage of confidential information or private use thereof must be reported by the Collaborator who became aware of it by using the Ethical Channel.

In the event of termination of his or her employment or professional relationship, the Collaborator shall return the confidential information to **FIRA**, including the documents and storage means or devices. In any case, the duty relating to the confidentiality of the information will remain in force.

Article 12. Disclosure of information

FIRA will provide comprehensive, true, and accurate information on its operations, activities and services. Any actions by the Collaborators shall be governed by this basic principle.

The information relating to the implementation of **FIRA**'s activities shall be provided on the basis of control criteria widely accepted in the exhibitions business.

FIRA's economic and financial information, particularly the annual accounts and tax returns, will accurately show its economic, financial and equity reality, in accordance with the generally accepted accounting principles and any financial reporting standards which may be applicable. In this regard, no Collaborator will conceal or distort the information in **FIRA**'s accounting records and reports, which will be comprehensive, accurate and true.

All internal and external information will be accessible depending on each case, organised in a simple and intuitive manner to facilitate its location, handling and understanding.

Article 13. Intellectual and industrial property

FIRA and its Collaborators undertake to protect their own and external intellectual and industrial property, including but not limited to copyrights, patents, trademarks, domain names, reproduction rights, design rights, know-how and software.

FIRA Collaborators are expressly banned from using works, creations (such as images, drawings, photographs, music, software, publications and texts) or distinctive features constituting the intellectual or industrial property of third parties without receiving confirmation that **FIRA** holds the corresponding rights and/or licences.

Furthermore, **FIRA** shall require its clients and contractors, within the framework of exhibition events, conferences, or other activities in the premises of the Organisation, that they act in accordance with the regulations on intellectual and industrial property. This, in accordance with the provisions of the Rules of participation of each Hall, by the Regulations of Participation as well as other regulation of development.

Article 14. Gifts, entertainment, travel

FIRA Collaborators shall avoid any unethical conduct addressed to unduly influence, in one own's benefit, or in the benefit of **FIRA** or a third party, in the decision-making of individuals or companies, whether public or private, nationally or internationally, which may pose a threat of corruption or bribery.

FIRA Collaborators and third parties may not make or accept promises, deliver gifts, entertainment, travel, money, advantages or any type of undue considerations aimed at influencing on public servants or public authorities, individuals or companies, whether public or private, nationally or internationally, in one own's benefit or in benefit of the Organisation or a third party.

Courtesy gifts and presents which do not exceed sixty euros (€60) are not included in this prohibition in accordance with the corporate policy in this matter. These include:

- Merchandising items.
- Occasional courtesies for specific reasons (such as Christmas presents), as long as they are not in cash.

Nor are the following included in the prohibition:

- Invitations or courtesies or travel which do not exceed the limits regarded as reasonable in the social manners prevailing in the sector, performed in the conditions established by the corporate policy on this matter.
- Invitations to fairs or professional events in the conditions established by the corporate policy on this matter.

Where there are any doubts regarding, what is acceptable or the value of the gift, courtesy, invitation, or travel, one must check with the internal regulations established to this purpose, and where applicable, enquire to the Compliance Officer prior to acceptance or delivery thereof.

Article 15. Conflicts of interest

Conflicts of interest are deemed to be any circumstances in which the personal interests of Collaborators are directly or indirectly contrary to or clash with **FIRA**'s interests, interfering in the proper compliance of their professional duties and responsibilities or personally involving them in **FIRA**'s economic transactions or operations.

On no account may **FIRA** Collaborators perform operations or conduct activities entailing or potentially entailing a conflict of interest. In this regard, they must avoid situations which may lead to conflicts between their personal, economic, or professional interests and those of **FIRA** and refrain from representing **FIRA** or intervening in or influencing decision-making in any situation in which they have a direct or indirect personal interest.

Where there are doubts as to the existence of conflict, Collaborators shall without delay inform the Compliance Officer by means of the Ethical Channel.

IV. THE BUSINESS ENVIRONMENT

Article 16. Clients

The principles of trust and transparency must be applied in all cases in relations with clients. The advice provided to clients will always be accurate and suited to their needs, offering the alternatives available in terms of products and services.

FIRA Collaborators will avoid any kind of influence on the part of clients by means of practices not permitted by this Ethical Code which may distort their impartiality and professional objectivity in any decision-making.

They may not receive, offer, request, or accept any kind of remuneration from clients. In particular, this obligation refers to Collaborators making decisions concerning the financial conditions of services to clients.

FIRA guarantees the right to privacy and the confidentiality of the data of its clients, complying with the provisions of the legislation on the protection of personal data.

FIRA's Collaborators who, due to their activity, gain access to its clients' personal data, must keep it confidential, and they undertake to not disclose them to third parties, save as with the client's consent.

Article 17. Contractors

FIRA undertakes to ensure that the contractors selection processes abide by the internal instructions on procurement. Awards of contracts will be in keeping with the principles of publicity, competition, transparency, confidentiality, equality, and non-discrimination, avoiding any conflict of influence, interest, or favouritism in the selection processes, and also guaranteeing compliance with the guidelines entailing that awards of contracts should be performed in such a way that the most advantageous offer is chosen.

Collaborators may not offer, receive, request, or accept any kind of undue remuneration or advantage from **FIRA** contractors for services resulting from their professional activity within **FIRA**. This obligation particularly refers to Collaborators making decisions regarding purchase and services procurement.

The information provided by **FIRA** Collaborators to contractors will be accurate, ensuring that it does not lead to any error or deception.

The prices and information submitted by contractors in selection processes, as well as any other sensitive information offered by contractors on account of their relationship with **FIRA** shall be processed confidentially and will not be disclosed to third parties, save as with the consent of the interested parties.

FIRA guarantees the right to privacy and the confidentiality of the data of its contractors, complying with the provisions of the legislation on the protection of personal data.

FIRA Collaborators who, due to their activity, gain access to its contractors' personal data, must keep their confidentiality, undertaking not to disclose them to third parties, unless they receive the contractor's consent.

Article 18. Market and competitors

FIRA bans all Collaborators from entering into any illegal conduct which may infringe free competition, whether from or via the Organisation.

Consequently, **FIRA** requires all Collaborators to strictly respect within their operating in the Organisation, the applicable regulations on free competition.

Article 19. Public Administrations

FIRA assumes a commitment to ensure that its relations with the Public Administrations and authorities will be conducted under the principle of full transparency and prohibits any practices which may be regarded as illegal.

FIRA Collaborators will refrain from making any gifts on behalf of, in favour of or at the cost of **FIRA**, including any mere promise of such acts, to political parties, authorities, organisations, entities, Public Administrations or institutions in general. Similarly, they shall reject any proposal by the latter to engage in any such conducts.

Any actions with the Public Administrations shall be duly documented.

Article 20. Prevention of money laundering, terrorist financing and control of payments

FIRA declares its firm commitment to the prevention of money laundering, terrorist financing and irregularities in payments.

To that end **FIRA** has implemented an internal Proceeding for the prevention of money laundering, terrorist financing and cash-payment control whereby a number of measures and guidelines are established aimed at preventing and detecting any conducts entailing money laundering and/or terrorist financing.

Among them, and in connection with the control of means of payment, it is set forth that **FIRA** Collaborators must monitor cash payments to or by third parties which appear unusual, as well as any made by cheques to the bearer, in foreign currencies or from accounts in tax havens, as well as the limitation to pay or collect invoices in cash amounting one thousand euros (€1,000.00) or more.

Article 21. Protection of the environment

FIRA conducts its activity in keeping with respect for the environment and its preservation, complying with the standards established in the applicable environmental regulations and minimising the impact of its activities on the environment.

FIRA assumes behavioural guidelines to minimise waste and pollution, preserve natural resources and promote energy savings.

FIRA Collaborators shall strive to minimise the environmental impact resulting from their activities and the use of the facilities, equipment and means of work placed at their disposal, ensuring efficient use thereof.

Similarly, in their relations with contractors and external partner companies, **FIRA** Collaborators shall convey these principles and require compliance with the environmental procedures and requirements applicable in each case.

V. THE CORPORATE COMPLIANCE PROGRAMME

Article 22. The Corporate Compliance Programme

In order to highlight the commitment of the Organisation with the ethical and regulatory compliance, and to prevent, detect and sanction potential breaches of the Ethical Code, and in general, of the legislation in force, **FIRA** has a Corporate Compliance Programme.

Article 23. The Compliance Officer

The Compliance Officer in **FIRA** is the person in charge of the promotion and supervision of the functioning of the Ethical Code, as well as the Corporate Compliance Programme of the Organisation.

The Compliance Officer is a unipersonal internal body with independent powers of initiative and control appointed by the Managing Director and ratified by the Board of Directors.

Every **FIRA** Collaborator shall provide the Compliance Officer with the cooperation required for the suitable exercise of his/her duties.

Article 24. Ethical Channel

FIRA has an Ethical Channel for the prevention, discovery and sanctioning of conducts which may pose a breach of the legislation in force, of this Ethical Code, and of the provisions set forth in FIRA's Corporate Compliance Programme in general.

The Ethical Channel is completely confidential and guarantees that the reporter of a breach do not suffer any reprimands, provided that it is used in good faith.

Reports made in bad faith, knowingly to be false or aimed at harming a colleague or manager shall be subject to disciplinary sanction, without prejudice to the potential criminal responsibility derived therefrom.

Employees shall bear in mind that they do not act in FIRA's interest when concealing a fact or incident infringing the Law or this Ethical Code.

VI. GENERAL PROVISIONS

Article 25. Disciplinary scheme

FIRA shall take the necessary measures for the effective application of the Ethical Code and, in general, of the internal regulations contained in the Corporate Compliance Programme.

On no account are **FIRA** Collaborators authorised to require another Collaborator to pursue an unlawful action or a breach of the provisions of this Ethical Code or other internal regulation of **FIRA**'s Corporate Compliance Programme. In turn, no Collaborator may justify improper or unlawful conduct or any which breaches the provisions of this Ethical Code, the internal regulations of the Corporate Compliance Programme or the law in general, by seeking refuge in an order from a hierarchical manager.

When, following the corresponding verification of the events, the Compliance Officer determines that a **FIRA** Collaborator may have carried out activities violating the provisions of the Law or this Ethical Code or the internal regulations of the Corporate Compliance Programme, he/she will propose to the General Management that said activities should be reported to the Personnel Department for the processing of the corresponding disciplinary case, in accordance with the provisions of the collective agreement or applicable labour legislation.

Article 26. Updates

The Ethical Code will be reviewed and updated on a regular basis in accordance with the internal regulations to the said purpose, taking into account suggestions and proposals made by **FIRA** Collaborators, among others.

Similarly, it will be modified or adapted when significant breaches of its provisions become apparent or when there are changes in the Organisation, in the control structure or in any such activity rendering the above necessary.

Any review or update entailing a modification of the Ethical Code will require the approval of **FIRA**'s Board of Directors.

Article 27. Acceptance

FIRA Collaborators expressly accept the operating standards established in this Ethical Code.

Any Collaborators who join or form part of **FIRA** in the future will expressly accept the operating standards established in the Ethical Code. The Ethical Code will be attached to the respective employment agreements.

Article 28. Approval

The Ethical Code is approved by **FIRA**'s Board of Directors.

FOLLOW-UP INFORMATION OF THE DOCUMENT *COMPLIANCE*

Document ID	Ethical Code
Document category	High-level regulation
Bodies to be applied to	FIRA INTERNACIONAL DE BARCELONA and its investees FIRA BARCELONA INTERNATIONAL EXHIBITIONS AND SERVICES, S.L., 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	07.10.2015; 22.03.2023
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