

CODE OF BUSINESS CONDUCT



EASYFAIRS

Visit the future

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FOREWORD: WHY DO WE HAVE A CODE OF BUSINESS CONDUCT?

Our mission is **«Visit the future»**. At Easyfairs, we believe that our success is not solely measured by financial achievements but also by **the positive impact we create** in the lives of our employees, partners, customers, and the wider communities we serve. Serving communities with integrity is one of Easyfairs' values and is at the core of who we are and what we stand for.

Our Code of Business Conduct outlines the principles and expectations that we, as a company, embrace and promote. It serves as a reminder of **our shared responsibility to maintain the highest ethical standards in everything we do**.

While many of the principles within this Code are already embedded in our daily operations and practices, rooted in common sense and longstanding values, we have taken the step to formally put them in writing. This reaffirms our unwavering commitment to being a socially responsible company, ensuring clarity and consistency in upholding these standards across our organisation.

Within this Code of Business Conduct, you will find guidelines and principles that cover a wide range of topics, including but not limited to integrity, respect, fairness, compliance with laws and regulations, confidential information, conflicts of interest, and responsible business practices.

These principles are designed to **guide us in our interactions with colleagues, partners, customers, public authorities and the communities we engage with**. This code is not merely a document; it forms an integral part of the working conditions for every individual associated with Easyfairs, including our valued contractors.

It is **our collective duty to embody these principles**, as they reflect the values that define our organisation. By adhering to this Code, we can create a work environment that is inclusive, respectful, and built on trust — a place where everyone can thrive and contribute their best. We encourage you to **familiarise yourself** with its content and principles and **integrate them into your day-to-day work and decision-making processes**.

Let us embrace this Code of Business Conduct as a guide to shape our actions and further **elevate the reputation and success of Easyfairs**.

Thank you for your unwavering commitment to excellence and for embracing the values that make Easyfairs a truly remarkable organisation.



Anne Lafère & Matt Benyon
Group CEOs

ABOUT THIS CODE - SCOPE

EMPLOYEES

This Code of Business Conduct applies to all employees, as well as to anyone who represents Easyfairs in any capacity, and defined as follows:

- **Employees:** All individuals who are on the payroll of Easyfairs, whether on a full-time, part-time, temporary, or contract basis, are bound by this Code of Business Conduct, as well as all employees of Easyfairs' subsidiaries and any affiliated entity or part of the Easyfairs Group. Our employees are informed about the Code of Business Conduct upon joining and are periodically reminded of its principles. Non-compliance with the Code of Business Conduct or any other Easyfairs compliance policy may result in disciplinary action up to and including termination of employment.
- **Contractors and Consultants:** Anyone engaged by Easyfairs to provide services, expertise, or support in any capacity must adhere to the principles outlined in this Code of Business Conduct during the duration of the engagement.
- **Volunteers and Interns:** Individuals who offer their time and skills voluntarily or participate in an internship programme with Easyfairs are expected to abide by this Code of Business Conduct.

This Code is an integral part of the relationship between Easyfairs and our employees. It shall not create any contractual rights for third parties.

This Code does not supersede our existing employment policies but rather complements them; in any instance where the Code and other policies or regulations differ, the higher standard shall prevail.

BUSINESS PARTNERS

The principles of this Code are also part of the selection criteria of our new business partners and shall be used in the periodic review of our relationships with existing business partners, including a.o. subcontractors, service providers, customers, etc.

In the event a business partner would demonstrate a different view on legality or is conducting business in such a way that is not reflecting the values of our Code of Business Conduct, it could result in a discontinuation of the business relationship.

ABOUT THIS CODE - RESPONSABILITIES

EMPLOYEES

As an employee of Easyfairs, you play a crucial role in maintaining an ethical work environment and upholding Easyfairs' reputation. Here are your key responsibilities concerning the Code of Conduct:

- **Read and Understand:** Take the time to understand this Code by thoroughly reading it and watching the dedicated modules on the Academy Online.
- **Comply and Adhere:** Conduct all business activities in strict compliance with the Code of Business Conduct and adhere to the highest ethical standards in your interactions with colleagues, clients, partners, and all stakeholders.
- **Ask Questions:** If you have any questions or uncertainties regarding the Code of Business Conduct or its application in specific situations, do not hesitate to seek clarification from your manager, the Group Head of Legal, the Group Head of Talent or the Group Head of Sustainability and Customer Experience.
- **Report Violations:** If you witness or suspect any violations of the Code of Business Conduct, it is your responsibility to speak up through the established reporting channels. We encourage open communication and a culture of accountability.

SENIOR LEADERSHIP TEAM

In addition to the above, members of the Senior Leadership Team hold an increased responsibility to promote and exemplify the values outlined in the Code of Conduct. As leaders, you are expected to:

- **Lead by Example:** Demonstrate the highest standards of ethical behaviour and integrity in your actions, decisions, and interactions. Your behaviour sets the tone for your team and the company as a whole.
- **Train and Educate:** Take an active role in educating your teams about the Code of Business Conduct and its significance. Ensure that all team members are familiar with it and understand the principles it contains.
- **Address Concerns and Protect:** Be approachable and responsive to concerns related to the Code of Business Conduct raised by your team members. Address and escalate issues appropriately, fostering a safe and supportive environment. Protect your colleagues against any form of retaliation after reporting concerns in good faith.
- **Promote a Culture of Integrity:** Foster a culture that prioritise ethics, mutual respect, and diversity and inclusion. Encourage open dialogue and transparency within your team.

This Code cannot foresee every situation that might arise and only identifies guiding principles to help make decisions consistent with Easyfairs' values.

It should be seen as a baseline, or a minimum requirement, which must always be followed unless doing so would violate the law.

The guiding principle remains: always act in an ethical way and in the best interests of Easyfairs.



COMPLIANCE WITH LAWS & REGULATIONS

We believe that respect for the law is the foundation of trust in any organisation

As valued members, we shall uphold the highest standards of ethical conduct. This includes unwavering compliance with all applicable laws, regulations and company policies while performing our job duties or representing Easyfairs in any capacity.





OUR PEOPLE

We recognise that embracing diverse perspectives, experiences, and backgrounds enriches our organisation. We are committed to create a safe working environment that values and promotes diversity, where there is equal opportunity for all and where every employee feels included, respected, and empowered to contribute their unique talents and perspectives.

2.1 NON-DISCRIMINATION AND EQUAL OPPORTUNITIES

Easyfairs is committed to a working environment that promotes diversity and offers equal opportunities.

We recruit, hire, develop, promote and provide conditions of employment solely based on skills and capabilities relevant for the job.

We are committed to develop our employee's skills and capabilities.

We do not tolerate any form of discrimination of or by our employees.

2.2 INCLUSIVITY

We firmly believe in providing a workplace where every individual is treated with fairness, dignity, and respect. We actively work to remove barriers, both physical and attitudinal, to ensure full participation and integration for all.

2.3 BULLYING AND HARASSMENT

Easyfairs has a zero-tolerance policy towards all acts of violence, bullying and harassment in any form. This includes but is not limited to physical, verbal, psychological or cyber bullying, as well as any behaviour that creates an intimidating, hostile or offensive environment.

We commit to take immediate action against any instances of misconduct, ensuring that the well-being, dignity and mental health of our employees are upheld. We provide resources and support for reporting and addressing concerns without fear of retaliation.



2.4 HEALTH AND SAFETY

Easyfairs is committed to the health, safety and well-being of all its employees. We shall ensure that our venues, facilities and workplaces are compliant with all applicable provisions governing occupational health and safety, and with fire and environmental protection.

All employees are equally responsible for knowing and applying any relevant health and safety laws and regulations and for calling out any safety hazards they become aware of.

2.5 DRUG AND ALCOHOL CONSUMPTION

At Easyfairs, we prioritise the well-being and safety of our employees, which is why we prohibit the consumption of alcohol or drugs during working hours.

If alcohol is served at company events or social gatherings, employees are expected to consume it responsibly and in moderation. Excessive drinking is strictly prohibited, and we maintain a zero-tolerance policy for impaired driving or for engaging in any work activity on behalf of Easyfairs while impaired by drugs or alcohol.

2.6 FREEDOM OF ASSOCIATION

We respect the freedom of association and the right of our employees to seek representation through trade unions, works council or any other organisation as protected by law.

2.7 FORCED OR CHILD LABOUR

We firmly oppose and prohibit the use of forced labour, child labour, and any form of exploitative practices. We strictly adhere to international labour standards and expect the same from all our business partners and suppliers.

We ensure that all individuals employed by Easyfairs, as well as those engaged in our supply chain, work willingly, voluntarily and in compliance with the legal age requirements of the International Labour Organization (ILO) Convention N°138 concerning Minimum Age or the age for completion of compulsory education in the relevant country, whichever is higher.

2.8 CONFLICT OF INTEREST

Conflicts of interest are situations, activities or financial interests which could interfere, or appear to interfere, with the employee's responsibilities, job performance, loyalty or decisions made on behalf of Easyfairs.

Employees have the responsibility to identify potential personal conflict of interests and always act in the best interest of Easyfairs. They will inform their line manager of any risk of conflict of interest due to the relationship they have with a stakeholder involved in a business transaction with Easyfairs.

EXAMPLES - CONFLICT OF INTEREST

- **Involvement in another organisation:** Serving in any capacity (eg consultant, director...) another organisation while being employed at Easyfairs (unless expressly permitted) would create a conflict of interest if (i) the other organisation competes with Easyfairs, (ii) this activity impacts the quantity or quality of the employee's work at Easyfairs, (iii) the activity would result in harming Easyfairs reputation, (iv) this activity would result in the employee providing any advantage to a business partner over the interest of Easyfairs...
- **Nepotism:** Supervising, approving or participating in any way in decisions involving the hiring, retention, promotion or any contractual relationship of the employee's spouse, partner, significant other or family member.
- **Financial interests in business partners:** Having personally a personal financial or ownership interest in a competitor, a supplier or a customer of Easyfairs or having a spouse or any relative work or consult with a competitor, supplier or customer of Easyfairs that the employee deals with.





2.9 CONFIDENTIALITY

We have the duty to protect the confidentiality of any non-public information entrusted to us as part of our business relationships and we take measures to protect and prevent access to such information by unauthorized persons.

We also commit to comply with all relevant data privacy requirements of the jurisdictions in which we operate.

Confidential information about Easyfairs must not be disclosed to third parties and the obligation to maintain it confidential remains effective after employment termination.

Our confidentiality duty covers also the duty to:

- Keep confidential passwords giving access to systems and portable devices entrusted by Easyfairs
- Safeguard the security of all portable devices (including laptops and cell phones)
- Maintain a clean desk policy clear of any sensitive information
- Not load unpermitted external softwares on company devices
- Report promptly theft of portable devices, phishing or hacking attempts.
- Follow mandatory training on cybersecurity

OUR BUSINESS PARTNERS

We are committed to work with business partners who share our values and to maintain with them fair and ethical relationships, based on a fair selection process and adherence to the principles set out in this Code of Business Conduct.

Integrity being one of our guiding principles, we are committed to communicate only fully transparent and reliable information in all circumstances.

3.1 ANTI-BRIBERY AND CORRUPTION

Easyfairs has a zero-tolerance stance on bribery and corruption. It is not permitted for any Easyfairs employee or representative to offer, give, solicit, accept or receive anything of value or any improper advantage with the intent to secure business or financial gain, either for Easyfairs or personally.

WHAT IS “BRIBERY” AND “CORRUPTION”?

Bribery:

- Any form of illicit payment, favor or benefit (cash, vouchers, shares, unreasonable gifts / entertainment / hospitality, discount, political or donations, excessive commissions, job offer or internship that bypasses the standard recruitment procedure...) offered, given, solicited or accepted with the intention to influence the actions, decisions or behaviour of an individual.
- Bribery encompasses not only the direct exchange of illicit advantage but also the act of offering or soliciting such advantage. The law considers both the offer and acceptance of bribes as violations, irrespective of whether the actual transfer of the advantage occurs.

Corruption:

- Corruption occurs whether the bribe is offered or received directly or through a third party (agents or any other intermediary).

TYPICAL SITUATION

SITUATION You have to obtain a permit from a local authority to run your event in 2 days but the administration has still not issued the permit. You go to the administration and the local official on duty mentions that he could provide you with the permit but that it will cost €50. You accept to pay the permit fee and ask for a receipt. The official tells you that there is no receipt for this transaction. Should you proceed with the payment?

ANSWER No, you should decline to make the payment if such process is not foreseen in any administrative regulation. It is a facilitation payment. Even if the amount is small, it is an act of corruption.

A facilitation payment is any payment given to a local official to accelerate the speed at which he/she performs a task. Any kind of facilitation payment is prohibited.

3.2 GIFTS, ENTERTAINMENT AND HOSPITALITY

Receiving or giving occasional gifts and receiving or providing entertainment and hospitality is part of developing regular business relationships, as long as the gift, entertainment and hospitality are reasonable and done in compliance with local laws.

Luxury, extravagant and unreasonable gifts, entertainment and hospitality should not be offered or received as they could create the perception that we are granting or trying to obtain a favorable treatment for Easyfairs by receiving or providing personal benefits from or to another person.

In addition, the following principles should always be respected:

- **Cash or cash equivalent** gifts are simply prohibited.
- **Gift offered in the context of a contractual negotiation, tender process or a vote** should not occur as they could be perceived to be made to influence the outcome of the process.

In case of doubt or if you have any questions related to receiving or providing any gift or hospitality, please refer to “Section 10 Raising a Concern” and to ask the relevant Easyfairs contact person.

TYPICAL SITUATIONS

SITUATION 1 When negotiating with a potential external organiser about choosing one of Easyfairs venues for his next events, Marc, the Easyfairs employee in charge of the negotiation, learns that the organiser is a massive football fan. Marc tells the organiser that he will get him tickets to the next Champions League Finale in Spain and will organise the trip for him and his wife. Is it a good idea?

ANSWER No. Although it is a very nice gesture, the entertainment offered is extravagant and comes at the moment when the organiser has to decide whether to organise his next event at Easyfairs' venue and to negotiate his contract. It is a clear risk of corruption. Employees should refrain from making any unreasonable gifts during contractual negotiations.

SITUATION 2 Sonia is part of a procurement team responsible for selecting a new IT service provider for Easyfairs. After a series of meetings with potential vendors, one of the candidate providers, Tech Solutions, expresses a keen interest in securing the contract. A few days later, Sonia and another member of the procurement team receive a €1,000 Apple giftcard from Tech Solutions. What should they do?

ANSWER Sonia and her colleague should graciously thank their Tech Solutions contact for the gesture but politely decline the gift, explaining that Easyfairs has strict policies prohibiting the acceptance of personal gifts during contractual negotiations and that they can be assured that the selection process will be based solely on objective criteria and the best interests of the company.

Employees should not accept cash or cash equivalent gifts from one of the suppliers, even more when they are involved in a buying/selection process as it could undermine the fair evaluation process, leading to the appearance of favoritism towards Tech Solutions.



3.3 ANTI-COMPETITIVE BEHAVIOURS

Easyfairs is committed to a fair and equitable competitive market and to fair and ethical business practices. We should never, directly or indirectly through an agent, engage in any form of activities that could undermine competition, such as price-fixing arrangements, market allocation, bid-rigging or any other collusive practices.

It is our collective responsibility to promote fair competition, respect the rights of other businesses and adhere to all applicable laws and regulations governing competition.

3.4 ETHICAL BUSINESS PRACTICES

At Easyfairs, we hold ourselves to the highest ethical standards and we expect the same from our business partners. We are dedicated to collaborating with organisations that share our commitment to integrity, transparency and lawful conduct. When selecting key business partners, we undertake a rigorous due diligence process to ensure that they align with our values and adhere to the same principles of legality and ethical business practices that guide our operations.

We are resolute in our stand against illegal activities, corruption, human rights abuses and any other unethical practices. Our criteria for selecting business partners include a thorough evaluation of their social responsibility, environmental sustainability efforts and commitment to fair labour practices.

We firmly believe that by joining forces with like-minded entities, we create mutually beneficial relationships that contribute to the success and reputation of both Easyfairs and our partners.





3.5 TRANSPARENCY AND INTEGRITY

We conduct our business honestly, transparently and ethically.

- **False or misleading statements**

Our books, records, reports and any statements about our business must be accurate and truthful.

- **Advertising, claims, representations**

Any advertising, claim or any representation in any print or electronic format must be transparent and truthful.

TYPICAL SITUATION

SITUATION John works at MIT and is about to post the press release to announce the event results. Based on the final MIT data he has received, the event welcomed 8,788 visitors. He mentions 8,800 in the press release. His Head of Event instructs to change the number of visitors and to write 10,200. Should John accept and change the press release?

ANSWER No. Representation must be substantiated and accurate. We should not mislead our customers and misrepresent information and facts.



OUR ENVIRONMENT

We strive to run our business in an environmentally responsible manner by reducing our environmental impact and supporting our communities in their transition to a durable economy by offering cutting-edge content programmes and learning opportunities.

We recognise the profound impact of human activities on the environment and are steadfast in our commitment to sustainable practices. Our environmental policy lies at the heart of our operations, guiding our decision-making processes and inspiring us to continuously seek innovative solutions that minimise our ecological footprint.

We have pledged to halve our greenhouse gas emission by 2030 and to be net zero by 2050. Therefore, we closely monitor our environmental impact and we strive to organize events and to run venues that prioritize sustainability and respect for the environment through various initiatives, such as waste reduction programmes, energy-efficient practices and responsible sourcing of materials.

We actively engage with exhibitors, partners and attendees to foster a culture of environmental awareness and encourage them to join us in our sustainability journey by dedicating a large part of the content programme of our events to sustainability topics.

Our employees are playing a key role in reducing our environmental impact and are encouraged to embrace our environmental commitment and to make the most sustainable choices whenever possible.



ANTI-MONEY LAUNDERING

We are firmly committed to prevent money laundering and any illicit financial activities.

As a responsible global organisation, we comply with all applicable laws and regulations related to anti-money laundering (AML) and combatting the financing of terrorism (CFT). Our employees, representatives and partners are expected to exercise due diligence in all financial transactions and report any suspicious activities promptly to the designated compliance officers.

WHAT IS A “MONEY LAUNDERING”?

Money laundering is the illegal process of making amounts of money generated by criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source.



IMAGE AND REPUTATION

Easyfairs' reputation and image are its intangible assets and we commit to protect them in all circumstances.

We are responsible for protecting Easyfairs brands and reputation. We shall represent the company at all time with utmost professionalism and strive to provide the highest standard of customer satisfaction.



RAISING A CONCERN

We promote a culture of transparency and accountability, encouraging our employees to promptly raise any concerns about law infringements and violations of this Code of Business Conduct

Should you...

- ▶ have any doubts or questions in a particular situation,
- ▶ become aware of any law infringement,
- ▶ suspect or witness a violation of the principles of this Code of Business Conduct, or
- ▶ witness any activity which poses or could pose a danger to the environment or to anyone working for Easyfairs,

...please ask your question or raise this issue promptly with your relevant point of contact at Easyfairs (see p21).

Easyfairs will have a zero tolerance policy for any form of retaliation against anyone who reports what they genuinely believe to be a concern. All cases will be appropriately investigated and, where breaches are found, appropriate actions will be taken immediately.





WHERE CAN I GO FOR ADVICE AND GUIDANCE ON OUR CODE OF BUSINESS CONDUCT?

You are not alone! If you have any questions on the Code of Business Conduct or any law or regulation, or if you wish to report a concern, we have processes in place to help you. Do not hesitate to contact any of the following people who will always be available to support you and indicate the best course of action:

- **YOUR LINE MANAGERS AND SENIOR LEADERSHIP** are available to answer questions and are generally most familiar with the Code and any guideline that apply to Easyfairs business activities.
- **YOUR LOCAL TALENT DEPARTMENTS** can explain and answer questions about employment policies, benefits and workplace issues.
- **THE GROUP HEAD OF TALENT AND THE GROUP HEAD OF SUSTAINABILITY AND CUSTOMER EXPERIENCE** are both available to answer your questions on this Code and to hear any concerns related to possible violations of the Code.
- **THE GROUP HEAD OF LEGAL** can explain and interpret this Code and can provide guidance about how to conduct business on behalf of Easyfairs in compliance with the law.



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