

# CODE OF CONDUCT

Approved by the Board of  
Directors 09/10/2019

Revision 19/04/2021

## Table of Contents

<b>1. PURPOSE</b>	<b>3</b>
<b>2. SCOPE OF APPLICATION</b>	<b>3</b>
<b>3. REGULATORY COMPLIANCE MANAGEMENT SYSTEM</b>	<b>3</b>
<b>4. BASIC ETHICAL PRINCIPLES OF BEHAVIOUR</b>	<b>4</b>
<b>5. IFEMA MADRID COMMITMENTS</b>	<b>4</b>
5.1. Compliance with Legislation	4
5.2. Human Rights and Civil Liberties	5
5.3. Equality and Non-Discrimination	5
<b>6. GUIDELINES FOR CONDUCT</b>	<b>5</b>
6.1. Health and Safety in the Workplace	5
6.2. Use of IT and Communication Systems	6
6.3. Effective Equality	6
6.4. Protection against Harassment	7
6.5. Preventing Conflicts of Interest	7
6.6. Confidentiality of Information and Data Protection	7
6.7. Fair Competition	8
6.8. Gifts and Gratuities	9
6.9. Corporate Image and Reputation	9
6.10. Use of Brands	9
6.11. Transparency	10
<b>7. ETHICS CHANNEL</b>	<b>10</b>
<b>8. REGULATORY COMPLIANCE COMMITTEE</b>	<b>10</b>
<b>9. ACCEPTANCE OF AND COMPLIANCE WITH THE CODE</b>	<b>11</b>
<b>10. EFFECTIVENESS</b>	<b>11</b>

## 1. PURPOSE

The purpose of this Code of Conduct is to lay down the principles governing the activity of **IFEMA MADRID** employees and collaborators, and to help consolidate the Institution's conduct based on respect, honesty, integrity, transparency and safety.

## 2. SCOPE OF APPLICATION

The principles and guidelines contained in this Code of Conduct are applicable to all commercial and institutional activities carried out by IFEMA MADRID, both nationally and internationally.

The following are subject to the provisions of this Code:

- All employees, managers, temporary staff, interns and members of the Governing Bodies of **IFEMA MADRID** (hereinafter referred to simply as "employees").
- Suppliers, clients, exhibitors and external professionals, who will be asked to accept the Code or to have their own equivalent code of ethics or conduct that upholds ethical principles and guidelines for action similar to those established by **IFEMA MADRID** (hereinafter referred to as "collaborators").

The Regulatory Compliance Committee (hereinafter "RCC") will help employees and collaborators to understand and comply with this Code and will take the necessary measures to ensure the correct implementation of the *Regulatory Compliance Management System*.

## 3. REGULATORY COMPLIANCE MANAGEMENT SYSTEM

This Code of Conduct is the main standard of the Regulatory Compliance Management System of **IFEMA MADRID**. It lays down the basic rules of conduct for employees and collaborators, which are subsequently developed in various internal policies.

All actions of employees and collaborators must comply with the ethical principles and rules of conduct set out in this Code, as well as with the rest of **IFEMA MADRID**'s internal regulations. In the event of any contradiction between what is stated herein and what is contained in any other internal regulation, the provisions of this Code shall prevail.

## 4. BASIC ETHICAL PRINCIPLES OF BEHAVIOUR

**IFEMA MADRID** undertakes to carry out its institutional activity under the highest ethical standards. It is therefore essential for employees and collaborators to carry out their activities in accordance, at the very least, with the following basic principles:

- **Loyalty and good faith:** all employees and collaborators shall carry out their professional activity with loyalty and good faith vis-à-vis the Institution, as well as with respect to any third parties with whom they have professional relations.
- **Integrity in decision-making:** it is the obligation of all employees and collaborators to act at all times in the interests of **IFEMA MADRID**, avoiding any personal or third-party interest that could influence their decisions or actions to the detriment of **IFEMA MADRID**.
- **Integrity of information:** the information handled within the professional sphere shall be treated and reflected in an integral, accurate and truthful manner, both internally and externally.

## 5. IFEMA MADRID COMMITMENTS

### 5.1. Compliance with Legislation

All employees and collaborators shall carry out their activities at all times in compliance with current legislation and the internal regulations of **IFEMA MADRID**, requesting the necessary information through the Ethics Channel and/or their hierarchical superior.

In particular, **IFEMA MADRID** employees shall pay special attention to any conduct that could result in a criminal offence, avoiding the commission of any offence at all costs. Any risk or indication of the commission of any breach or offence within or on behalf of the Institution shall be reported through the Ethics Channel.

The relationship with suppliers shall be based on the application of the Public Sector Procurement legislation and the Entity's Procurement Rules and Standards. The selection of suppliers shall be governed by the principles of transparency and non-discrimination and equal treatment of applicants and ensuring efficient use of funds.

The staff involved in the purchasing processes shall refrain from disclosing to third parties the prices and information submitted by suppliers, unless legally required to do so.

Furthermore, they shall behave impartially, always pursuing the best interests of the Company, basing their actions on principles of quality, profitability and service.

## 5.2. Human Rights and Civil Liberties

**IFEMA MADRID** undertakes to respect and protect the civil rights and liberties recognised in the Universal Declaration of Human Rights and in the main international agreements on the subject. The Institution shall carry out its professional activities respecting and guaranteeing the rights and liberties of its employees and collaborators.

In accordance with the Universal Declaration of Human Rights, **IFEMA MADRID** expressly condemns and prohibits any type of work or service performed by a person under threat, punishment or inhumane conditions or by any person under the minimum working age.

## 5.3. Equality and Non-Discrimination

**IFEMA MADRID** guarantees equal employment opportunities and non-discrimination on grounds of sex, sexual orientation, marital status, age, race, nationality, social status, religion, political opinion, trade union membership, or any other characteristic protected by law.

**IFEMA MADRID** undertakes to provide a working environment in which everyone is treated with respect and dignity. Each person must be able to work in a professional environment that promotes equal employment opportunities and prohibits discriminatory practices.

Furthermore, **IFEMA MADRID** does not accept any kind of harassment, abuse of authority, physical violence or any other practice that may create an offensive or disrespectful working environment.

## 6. GUIDELINES FOR CONDUCT

### 6.1. Health and Safety in the Workplace

**IFEMA MADRID** undertakes to ensure a healthy working environment and safe working conditions and workplaces for its employees, as well as to promote the participation of all its employees in the prevention of occupational accidents. **IFEMA MADRID** has approved an *Occupational Risk Prevention Policy* to document its objectives in this area. All employees must be aware of this policy and are responsible for working safely.

Furthermore, ensuring the health and safety of all the people who work at **IFEMA MADRID** facilities is one of the Institution's primary objectives. For this reason, the *Occupational Risk Prevention Policy* is also applicable to third-party companies carrying out work on the Institution's premises.

## 6.2. Use of IT and Communication Systems

Employees may use the Institution's IT and technological resources to carry out their job activities in accordance with the internal regulations of **IFEMA MADRID** drawn up for this purpose.

In general, **IFEMA MADRID** employees may not use the IT and technological resources for private purposes in an abusive manner.

Under no circumstances may employees use these resources to carry out any activity that interferes with the communications of other employees or disturbs the normal operation of the Institution's network, and they must always use them in compliance with the provisions of the **IFEMA MADRID Security Document**. Employees may only use the Institution's own software or software for which they have the appropriate licence.

## 6.3. Effective equality

One of **IFEMA MADRID**'s priority objectives in labour relations is to protect effective equality both in terms of access and career advancement, rejecting any possible type of discrimination.

**IFEMA MADRID** has a firm respect for the personal and family life of its employees, which is why it will take measures at all times to promote the work-life balance of its employees in the best possible conditions.

In order to achieve effective equality, **IFEMA MADRID** pays the same remuneration to all employees who perform work of equal value, and under no circumstances shall it discriminate against employees for any reason whatsoever.

**IFEMA MADRID** will not tolerate any act or comment that could undermine equality between employees. For this reason, it has developed an Equality Plan with the aim of achieving effective equality among all its employees.

## 6.4. Protection against Harassment

**IFEMA MADRID** considers any form of harassment at work to be entirely unacceptable.

**IFEMA MADRID** undertakes to ensure a positive working environment, to prevent harassment and to investigate and settle any case of harassment that may occur in the workplace. Accordingly, the use of sexist language that may lead to discriminatory situations or harassment is strictly forbidden.

For this reason, **IFEMA MADRID** has drawn up a Harassment Protocol, which lays down the measures that **IFEMA MADRID** takes to avoid and prevent situations of harassment, and, failing this, an effective, swift and confidential procedure for investigating and settling any case in which a report or internal complaint is made by an employee regarding an alleged case of harassment.

## 6.5. Preventing Conflicts of Interest.

**IFEMA MADRID** considers it imperative for its employees to make decisions based on the best interests of the Institution.

Employees shall therefore avoid any actual or potential conflict of interest that may arise during the performance of their work and shall always make decisions in a fair and impartial manner, based on objective evaluations free of influence.

IFEMA MADRID has developed a *Conflict of Interest Policy*, which sets out in detail how the Institution's employees should act in the event of a possible conflict of interest.

## 6.6. Confidentiality of Information and Data Protection

- **Confidentiality of Information:**

**IFEMA MADRID** considers information and knowledge to be essential assets for the management of the Institution, which is why they must be subject to special protection.

All information that employees are required to disclose, both internally and externally, must be truthful and complete.

All employees shall maintain the strictest confidentiality regarding all information, whether their own or that of third parties, to which they have access in the course of their work, even after the termination of their relationship with **IFEMA MADRID**.

- **Data Protection:**

**IFEMA MADRID** complies with current legislation on data protection, protecting the personal data entrusted to it by its clients, employees, or any other third party for the purposes and processing envisaged. Furthermore, it undertakes to request and use only such data as is strictly necessary for the smooth running of its activities within the current legal framework.

Employees who, in the course of their professional activity, have access to information regarding other employees, shall respect and protect the confidentiality of this information and shall use it in a responsible and professional manner.

## 6.7. Fair Competition

**IFEMA MADRID** is committed to the principles of Fair Competition in the purchase and sale of products and services, basing its decisions solely on objective commercial considerations.

**IFEMA MADRID** will not attempt to obtain, encourage or tolerate special favours with suppliers or customers that may prevent fair and unrestricted commercial relations. Therefore, all **IFEMA MADRID** employees are required to act impartially and objectively, using objective criteria when making decisions and avoiding the clash of their personal interests with those of the Institution.

**IFEMA MADRID** undertakes to compete fairly in the markets, refraining from disseminating, under any pretext, false or biased information against its competitors and avoiding decisions or actions that infringe the rules of good faith and free competition.

**IFEMA MADRID** has an *Anti-Corruption Policy* to ensure that all commercial operations conducted at the Institution are carried out with the utmost due diligence and in compliance with current legal regulations.



## 6.8. Gifts and Gratuities

**IFEMA MADRID** upholds a zero-tolerance policy towards corruption. Therefore, **IFEMA MADRID** employees and collaborators may not accept or offer gifts, gratuities, commissions, retributions, hospitality, benefits or any other kind of favour, apart from the exceptions specified in the *Gifts and Gratuities Policy*.

Employees and collaborators shall comply at all times with the provisions set out and implemented in the *Gifts and Gratuities Policy*.

## 6.9. Corporate Image and Reputation

**IFEMA MADRID** considers its image and reputation to be one of its most valuable assets for preserving the trust of its employees, customers, suppliers and society in general.

All employees shall take the utmost care to preserve the image and reputation of **IFEMA MADRID** in all their professional activities. They shall also ensure respect for and the correct use of the corporate image and reputation by collaborating companies.

The Institution's employees shall take special care in any public appearance and must have the necessary authorisation to speak to the media and participate in professional conferences or seminars and any other media or channel that may involve public dissemination.

Employees who become aware of any unauthorised disclosure of confidential information, whether their own or that of third parties, which is the responsibility of **IFEMA MADRID**, shall immediately inform the *Director of Communication* and/or the Ethics Channel, so that **IFEMA MADRID** may take the appropriate measures as soon as possible.

## 6.10. Use of Brands

The trademark, logo and name of **IFEMA MADRID** may only be used in the performance of the activities, actions and objectives of the Institution, and may not be used for personal or third-party purposes that have not been subject to prior and express authorisation.

Trademarks, logos or names of other entities may not be used without their prior consent. In the event of authorisation for their use, the instructions and rules of use provided by the owner of the brand must be followed.

## 6.11. Transparency

All actions of all **IFEMA MADRID** employees and collaborators shall be based on the principle of transparency of information.

All information made public by **IFEMA MADRID** shall be truthful, appropriate, useful and consistent, and under no circumstances may information that does not give a true and fair view of the Institution's status be published.

In particular, the Institution's accounts shall reflect a true and fair view of the Institution's financial position and shall be kept in accordance with generally accepted accounting rules and principles.

## 7. ETHICS CHANNEL

**IFEMA MADRID** provides employees, managers, members of the Governing Bodies, temporary staff, interns, suppliers and the public attending trade fairs and events with a confidential communication channel, in order to enable them to make enquiries and report any suspected or actual infringements of the Institution's legislation or internal regulations.

The Ethics Channel set up at **IFEMA MADRID** is the main channel of confidential communication and enquiry between employees and third parties related to the Institution's Regulatory Compliance Committee.

The Ethics Channel shall be the responsibility of the RCC and, by delegation of the RCC, of the Ethics Channel manager, who shall perform his or her duties under the principles of confidentiality, completeness, respect and dignity, which shall be applied throughout the entire procedure.

## 8. REGULATORY COMPLIANCE COMMITTEE

The Regulatory Compliance Committee is a body of the Institution, attached to the Executive Committee, with autonomous initiative and monitoring powers, whose mission is to regulate, implement and guarantee, as far as possible, compliance with the duties of supervision, monitoring and control of the Institution's risks.

The RCC shall be equipped at all times with the material and human resources necessary for the smooth performance of its functions.

In order to carry out its functions effectively, as far as is reasonable, the RCC shall have access to the necessary information and documents of the Institution, provided that the applicable legislation so permits.

All persons subject to this Code shall provide the RCC with the cooperation required by the latter for the smooth performance of its functions.

Any query or proposal for improvement addressed to the RCC shall be made through the Ethics Channel.

## 9. ACCEPTANCE OF AND COMPLIANCE WITH THE CODE

**IFEMA MADRID** shall communicate and disseminate the content of this Code of Conduct to all its employees and collaborators. All employees who join or become part of the Institution must accept the principles and rules of conduct laid down in this Code.

**IFEMA MADRID** expects all its employees and collaborators to be fully committed to complying with its Code of Conduct. Persons subject to the Code who fail to comply with it may be subject to disciplinary measures proportionate to the degree of non-compliance. The disciplinary regime shall be governed in accordance with legal regulations and the applicable collective bargaining agreement.

No one, regardless of level or position, is authorised to require an employee to contravene the provisions of this Code. No employee may justify misconduct on the grounds of an order from a superior or lack of knowledge of this Code.

## 10.EFFECTIVENESS

This Code of Conduct shall enter into force on the day of its publication on the **IFEMA MADRID** Intranet and Transparency Website and shall remain in force until its repeal is approved.

It will be periodically revised and updated by the Board of Directors of **IFEMA MADRID**, at the initiative of the Executive Committee, which will take into consideration the suggestions and proposals made by the Works Committee and the employees, as well as the commitments made by **IFEMA MADRID** in terms of social responsibility and good governance.

The Board of Directors of **IFEMA MADRID** shall not require approval for updates that involve only grammatical or spelling changes that do not alter the contents of the Code. In these cases, approval may be granted by the Regulatory Compliance Committee.

This update of the **IFEMA MADRID** Code of Conduct was approved by the Regulatory Compliance Committee on 19 April 2021.