

# POLICY CUM-PO-01

# CODE OF CONDUCT

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## 1. Purpose

This Code of Conduct is to establish the **principles and commitments** that govern the conduct and actions of the staff and collaborators of **IFEMA MADRID** (hereafter referred to as "the Institution"). It is designed to ensure that all conduct is based on respect for the rules, non-discrimination and equal treatment, honesty, integrity, transparency and sustainability.

## 2. Scope and General Aspects

This Code of Conduct sets out the principles and guidelines that apply to all **commercial, institutional and labour activities** carried out by IFEMA MADRID, both nationally and internationally.

**They are subject** to this Code's provisions:

- All employees, managers, members of the Governing Bodies, temporary staff and interns of IFEMA MADRID (hereinafter, "the **Staff**").
- Suppliers, customers, exhibitors and external professionals (hereinafter referred to as "**collaborators**").

**IFEMA MADRID's culture** is made up of the following Purpose, Mission, Vision and Values

### 2.1. Purpose

IFEMA MADRID plays a pivotal role in Madrid's economy and employment, driving growth through the promotion, encouragement and development of trade, industry and services, as well as the consolidation of the "Madrid" and "Spain" brands on the international stage.

### 2.2.- Mission

To create and promote environments that facilitate connections between people, companies and society, driving economic growth and competitiveness based on excellence and added value.

### 2.3.- Vision

To position Madrid and Spain as a reference on the global economic stage, fostering wealth generation, knowledge and the creation of business opportunities.

### 2.4.- Values

These are the ethical principles, beliefs and values that underpin the company's culture and inform our behavioural patterns. The proposals are developed by the **Management Committee** following a reflection exercise on the above aspects.

- **COMMITMENT AND CLOSENESS** with all individuals, both those who contribute to the institution's growth from within and those who seek to collaborate with us.
- **DYNAMISM AND CREATIVITY** to seek out and seize today's best opportunities that have the potential to become significant projects in the future.
- **EFFICACY AND EFFICIENCY** in achieving our objectives through the most appropriate solutions for each situation.
- **SUSTAINABILITY AND TRANSPARENCY** to be an institution that represents the best values of the society it serves and to which it owes its duty.

### **3. Compliance Management System**

This Code of Conduct represents the **primary guideline** of IFEMA MADRID's Regulatory Compliance Management System. This document sets out the basic rules of conduct for IFEMA MADRID staff and external collaborators. These rules are also included in **other internal policies and rules of the Institution**.

All actions of IFEMA MADRID staff and external collaborators must comply with the ethical principles and rules of conduct set out in this Code, as well as with the Institution's internal regulations. In the event of any contradiction between this Code's provisions and those of any other internal rules, this Code's provisions shall prevail.

### **4. Ethical Principles**

IFEMA MADRID is committed to conducting its commercial, institutional and labour activities in accordance with the **highest ethical standards**. It is therefore essential that all staff and partners adhere to the following basic principles when carrying out their activities:

#### **4.1. Legality**

Compliance with the Constitution, the legal system's rules and the Institution's Statutes.

#### **4.2. Honesty and Integrity**

It is the responsibility of all staff and collaborators to always act in IFEMA MADRID's best interests, avoiding any personal or third-party interests that could influence their decisions or actions in a way that is detrimental to the Institution. Information handled in the professional sphere must be treated and reflected in a complete, accurate and truthful manner, both internally and externally.

#### **4.3. Transparency and Good Governance**

IFEMA MADRID is committed to conducting its activities in accordance with its statutes and operating rules, ensuring transparency in its economic and financial management, and implementing quality and sustainability initiatives. The Institution has a **Transparency Portal** accessible on its website.

#### **4.4. Sustainability**

The Institution is committed to promoting compliance with the Sustainable Development Goals (SDGs) in several ways. Firstly, we work to ensure that our own activities align with the SDGs. Secondly, we seek to foster alliances with some of our stakeholders with the aim of promoting the proactivity of organisations, companies and individuals.

### **5. Commitments to Conduct**

#### **5.1. Compliance with Legislation**

All staff and collaborators are required to conduct their activities in accordance with current legislation and IFEMA MADRID's internal regulations at all times.

The Institution provides its staff and external collaborators with a web platform for the communication of queries or complaints related to legislation, the Code of Conduct, internal regulations or any ethical issue related to the Institution or to the behaviour of any of the collaborators or interested parties.

**IFEMA MADRID staff must pay special attention to any conduct that could result in criminal liability and must avoid, in all cases, the commission of any offence.** Any risk or indication of a breach or offence being committed by or on behalf of the Institution should be reported through the **Whistleblowing Channel**.

The relationship with suppliers shall be based on the application of the Public Sector Procurement legislation and the Institution's Procurement Rules and Criteria. The selection of suppliers shall be conducted in accordance with the principles of transparency, non-discrimination and equal treatment of candidates, and ensuring efficient use of funds.

All staff involved in procurement processes are required to refrain from disclosing prices and information submitted by suppliers to third parties, except in cases of legal obligation.

It shall also act impartially, always seeking the best interests of the institution, basing its actions on criteria of quality, cost-effectiveness and service.

## 5.2. Human Rights and Civil Liberties

IFEMA MADRID is committed to respecting and protecting the public rights and freedoms recognised in the **Universal Declaration of Human Rights** and in the principal international agreements. The Institution shall conduct its professional activities in accordance with the rights and freedoms of its staff and collaborators.

In accordance with the Universal Declaration of Human Rights, IFEMA MADRID explicitly 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 is committed to providing **equal employment opportunities and ensuring that all individuals are treated fairly and equally**, regardless of sex, gender, sexual orientation, marital status, age, race, nationality, social status, religion, political opinion, trade union membership, or any other characteristic protected by law.

In IFEMA MADRID's **selection and recruitment processes**, only objective criteria will be considered. This process ensures that all candidates are evaluated solely based on their merit and ability, in accordance with the established criteria and principles of equal opportunity. To avoid any preferential treatment among employees on the grounds of kinship, professionals who are relatives of the candidates concerned shall not participate directly in the selection process. It is not permitted for relatives to be in a hierarchical relationship with one another. Efforts will be made to avoid their concurrence in the same areas. All of this is in accordance with the internal implementing regulations.

IFEMA MADRID is dedicated to maintaining a professional and respectful **work environment** for all employees. It is the right of every individual to work in an environment that promotes equal employment opportunities and prohibits discriminatory practices.

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

IFEMA MADRID is committed to ensuring that all employees are treated equally and fairly, with **equal access to opportunities** for professional advancement. Discrimination of any kind is unacceptable.

IFEMA MADRID is committed to maintaining a **strict respect for the personal and family lives** of its employees. As a result, the company will always promote actions to enable employees to reconcile their work and family lives in the best possible conditions.

IFEMA MADRID is committed to maintaining a work environment **free from harassment** of any kind. **Furthermore, it is committed to preventing and prosecuting any case of harassment that may occur in the workplace or business environment.**

IFEMA MADRID has approved the *Harassment Prevention Policies*, to show its commitment to dealing with issues of harassment. It is mandatory for all staff to be fully aware of and to comply with these regulations.

#### 5.4. Occupational Health and Safety in the Workplace

IFEMA MADRID is dedicated to maintaining a healthy and safe working environment for its employees, as well as promoting their involvement in accident prevention.

IFEMA MADRID has approved an **Occupational Risk Prevention Policy**, which sets out the company's objectives on this issue. It is the responsibility of all staff, as well as collaborators, to be familiar with this policy and to work safely.

Furthermore, the Institution's primary objective is to ensure the health and safety of all personnel working at IFEMA MADRID facilities. The Institution's *Occupational Risk Prevention Policy* also extends to third-party companies carrying out work on its premises.

#### 5.5. Preventing Conflicts of Interest

IFEMA MADRID is of the firm belief that its staff's decision-making process should be based on the Institution's best interests.

IFEMA MADRID staff are required to avoid any real or potential conflict of interest that may arise during the performance of their duties. They must always make decisions in a reasoned 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 staff should act in the event of a possible conflict of interest.

#### 5.6. Confidentiality of Information and Personal Data Protection

IFEMA MADRID considers information and knowledge to be essential assets for the Institution's management. As such, they must be subject to special protection.

All staff and collaborators are required to maintain the strictest confidentiality regarding all information, whether their own or that of third parties, to which they have access due to their work, even after their relationship with IFEMA MADRID has ended.

IFEMA MADRID is committed to complying with current data protection legislation. It protects the personal data entrusted to it by its staff and collaborators, or any other third party, for the intended purposes and processing. Furthermore, it is the company's policy to request and use only those data that are strictly necessary for the efficient management of its activity within the current legal framework.

All staff and collaborators who have access to personal information during their professional activities are required to respect and promote the confidentiality of this information and to use it responsibly and professionally. **As a member of the IFEMA MADRID team, you will use the Institution's IT and technological resources to perform your job duties in accordance with the internal IFEMA MADRID regulations.**

### 5.7. Fair Competition

IFEMA MADRID is dedicated to the principles of fair competition in the purchase and sale of products and services. All decisions are made exclusively on objective commercial considerations.

IFEMA MADRID will not seek, encourage or tolerate any special favours with suppliers or customers that may prevent fair and unrestricted business relations. For this reason, all IFEMA MADRID staff and collaborators are required to act impartially and objectively, applying objective criteria when making decisions and avoiding any conflict of interest.

IFEMA MADRID is committed to competing fairly in the market, ensuring that it does not disseminate false or biased information against its competitors, and avoiding decisions or actions that infringe the rules of good faith and free competition.

### 5.8. Anti-Corruption Measures

IFEMA MADRID is committed to maintaining the highest standards of integrity and transparency in all its operations. It has established an ***Anti-Corruption Policy***, which sets out the measures to be taken to prevent any individuals or entities to whom the policy applies from engaging in conduct contrary to current regulations. Furthermore, the policy ensures that the best practices are in place to prevent such conduct.

The Institution also has a ***Gifts and Presents Policy***, which states that IFEMA MADRID staff and collaborators may not accept or offer gifts, presents, commissions, remuneration or hospitality, or benefits of any kind, except in accordance with the exceptions set out in this Policy.

### 5.9 Corporate Image, Brand and Reputation

IFEMA MADRID considers its image and reputation to be among its most valuable assets, with the objective of maintaining the trust of its staff, customers, suppliers and society in general.

It is of the utmost importance that IFEMA MADRID's staff take every measure to safeguard the institution's image and reputation in all professional activities. They shall also ensure that their collaborators respect and use the corporate image, brand and reputation in accordance with the Institution's corporate strategy.

Regarding actions before the media, any public intervention by IFEMA MADRID representatives before the media must be reported to the **Communications Department**. This department will assess the impact and advise on the strategy and messages. In the case of statements on matters of an institutional nature, the President, the Vice-President, the Director of Communications or any

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other individual designated by the Communications Directorate shall be the sole spokesperson for the media. In the case of matters relating to the activity of trade fairs and other operational areas of the Institution, please report any intervention to the Communications Department. In the event of a media enquiry, the spokesperson will be the Director of the trade fair or the Director of the corresponding area. If they are unavailable, the Commercial Manager or the person delegated to deal with statements from the media will be the spokesperson. If any communication with the media could potentially impact the reputation of IFEMA MADRID, it is imperative that all such actions or statements are first approved by the Communications Department.

**In the case of the use of social networks, the Institution's staff and collaborators must refrain from expressing opinions, comments or judgements that could negatively impact the reputation of the IFEMA MADRID brand or its interests, whether on personal or professional channels.** Should any media engagement be required, express authorisation must be obtained from the Communications Directorate, as well as from their directors in the case of participation in professional conferences, talks or similar events.

Should any unauthorised disclosure of IFEMA MADRID occur, please notify the Communications Department without delay. This will enable IFEMA MADRID to implement the necessary corrective action in a timely manner.

The **brand, logo and name** of IFEMA MADRID may only be **used** in the exercise of the activities, actions and aims of the Institution, and may not be used for personal or third party purposes that have not been previously and expressly authorised.

The use of trademarks, logos or names of other entities is not permitted without the prior consent of the relevant party. Should authorisation for use be granted, it is imperative that the instructions and rules of use communicated by the trademark owner are adhered to.

## 6. Communications and Complaints Channel

All IFEMA employees, collaborators, suppliers, customers and external professionals must report any risk or breach of current legal regulations, the Code of Conduct, as well as any other internal rules of the Institution, through the Complaints Channel set up for this purpose. Furthermore, this channel may be used to raise any questions on the interpretation of legislation, internal regulations or any ethical issue. IFEMA has an ***Information and Complaints Management Policy*** and development procedure that regulates its operation.

## 7. Regulatory Compliance Committee

The Regulatory Compliance Committee is a collegiate body of an internal, executive and permanent nature, with autonomous powers of initiative and control. It is appointed by the IFEMA Executive Committee, and its mission is to guarantee, as far as possible, compliance with the duties of supervision, monitoring and control of IFEMA's compliance risks. It also develops IFEMA's general policies and strategies in terms of risk prevention, code of conduct and, in general, compliance policies.

The Committee shall have the necessary material and human resources and means for the proper functioning and performance of its functions in accordance with the terms approved by the Executive Committee.



## **8. Acceptance and Compliance**

IFEMA MADRID will ensure that all staff and collaborators are aware of this Code of Conduct's content.

IFEMA MADRID expects its staff and collaborators to demonstrate a high level of commitment to comply with its Code of Conduct and implementing regulations.

Any action contrary to the provisions established in the Code and the Institution's internal regulations will be analysed and may result in sanctions in accordance with the internal procedures, agreements and legal regulations in force. IFEMA MADRID reserves the right to take the necessary judicial and extrajudicial actions to claim damages caused.

It is not permitted for any employee, regardless of their level or position, to be required to contravene this Code's provisions. It is not acceptable for any employee to justify misconduct on the grounds of a superior order or ignorance of this Code's content.

## **9. Term**

This Code of Conduct shall enter into force on the date of its publication on the IFEMA MADRID Intranet and Transparency Portal and shall remain in force until it is repealed.

IFEMA MADRID's Governing Board will periodically review and update the document in question. This will be done at the Executive Committee's initiative, which will consider suggestions and proposals made by the Works Council and employees, as well as commitments made by IFEMA MADRID in terms of social responsibility and good governance.

The IFEMA MADRID Governing Board will not require approval for updates that only constitute grammatical or spelling changes, provided that the content remains unchanged. In such instances, approval may be granted by the Regulatory Compliance Committee.