CODE OF CONDUCT

Code of Conduct of Freiburg Wirtschaft Touristik und Messe GmbH & Co. KG (FWTM) for legally compliant and responsible behaviour

Management
Marketing
FWTM
FREIBURG

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1. INTRODUCTION

As a public company, Freiburg Wirtschaft Touristik und Messe GmbH & Co KG (FWTM) is particularly committed to complying with the legal requirements and the Basic Law of the Federal Republic of Germany. In a constantly changing business world, our aim is to create an environment based on trust, fairness and transparency. This Code of Conduct is a reaffirmation of our commitment and a clarification of our values and principles for responsible behaviour. The Code of Conduct is intended to guide our day-to-day actions, without claiming to provide exhaustive answers to every question that may arise. It is intended to ensure that all FWTM employees have a common understanding of ethical, legally compliant and responsible behaviour and act accordingly.

2. INTEGRITY AND COMPANY PRINCIPLES

As a subsidiary of the City of Freiburg, FWTM is aware of its responsibilities towards society, its employees, customers and business partners, especially as part of the public sector. This is also reflected in our corporate values of passion, quality, commitment, respect, curiosity and sustainability. In addition to professional expertise, the sense of responsibility of employees and executives is particularly important.

The Code of Conduct defines the principles that apply to all FWTM employees. It is to be understood as a binding internal company standard, in addition to the existing rules, regulations and ordinances (employment/service contracts, company agreements, compliance guidelines, operating procedures, rules of procedure, shareholders' agreements, legal system, etc.).

3. PRINCIPLES OF CONDUCT

The following principles are intended to assist in the application of behavioural requirements to selected areas of day-to-day work.

3.1 DIVERSITY AND EQUAL OPPORTUNITIES

We are committed to working together respectfully and fostering a working environment characterised by courtesy, fairness and mutual respect. Any form of discrimination must be avoided. No one may be discriminated against, favoured, harassed or excluded on the basis of ethnic origin, skin colour, nationality, religion or belief, gender or age, marital or educational status, physical characteristics, any disability, sexual identity or orientation or social background. All employees should find themselves in an environment that values diversity and ensures equal opportunities. FWTM

expects its employees to behave in a friendly, professional, fair and cooperative manner both inside and outside the company. Discrimination, harassment or any form of inappropriate behaviour will not be tolerated.

3.2 HEALTH AND SAFETY

Protecting the health and safety of employees and others affected by our company's activities is a top priority for FWTM. We strive to create a working environment in which all employees can perform to the best of their ability while maintaining their physical and mental health. Workplaces and workplace equipment comply with the applicable laws and regulations. All employees are informed about the occupational health and safety guidelines and are responsible for complying with them.

3.3 WORK-LIFE BALANCE

Our work culture is based on trust and respect. FWTM creates an environment that supports employees in their individual life situations so that they can reach their full potential and remain productive. To this end, we offer a wide range of work-life balance options based on company agreements.

3.4 CONFLICTS OF INTEREST

FWTM employees must clearly separate personal interests from business decisions and are urged to avoid potential conflicts of interest. Staffing decisions or business relationships with third parties must also be based exclusively on objective criteria – they must not be characterised by private interests and relationships. Any personal, financial or other interests that could conflict with the interests of the company must be disclosed to the relevant executive without delay.

3.5 COOPERATION WITH THE WORKS COUNCIL

FWTM works together with all employees and the Works Council in the spirit of respect and trust, always seeking a fair balance between the economic interests of the company and the interests of the employees. Even when disputes arise, it remains our goal to work together to create and maintain a stable basis for constructive cooperation.

3.6 PROTECTION OF COMPANY ASSETS AND BUSINESS SECRETS

Company property may only be used for business purposes, unless this has been expressly authorised by the employer. Employees are obliged to protect the company's property from loss, theft or misuse. In addition to tangible property, company property also includes intangible property, in particular stored data, business secrets and confidential information such as internal reporting data or data on customers, business partners and business methods. Employees must not disclose any

trade or business secrets to third parties, both during the term of the employment relationship and after its termination.

3.7 SOCIAL STANDARDS

FWTM is firmly opposed to forced labour, child labour and any form of exploitation, and is committed to strict compliance with the relevant legal requirements.

FWTM pays its employees wages and salaries as well as security benefits that at least meet or exceed national legal standards. FWTM also supports the further development of its employees' professional skills by offering suitable training and development programmes within its operational capabilities.

FWTM assures to fully recognise the right to freedom of association in each country in which it provides its services.

3.8 ENVIRONMENTAL PROTECTION

FWTM is committed to sustainable management and the responsible use of natural resources. Employees are urged to be environmentally responsible and to help shape environmental protection measures.

4. LEGAL COMPLIANCE

FWTM always acts in accordance with the applicable legal provisions and the highest ethical standards. Our commitment to legal compliance extends to all aspects of our business activities, including respect for human rights, compliance with health, safety and environmental protection regulations, and a strict rejection of corruption, money laundering and bribery.

All employees are obliged to behave in accordance with the law and to make ethically sound decisions. Any form of fraud, breach of trust, theft, embezzlement, bribery or corruption, tax evasion or money laundering is prohibited, regardless of whether this damages company assets or the assets of third parties.

All executives must ensure that employees are aware of and comply with this obligation, both in national and international jurisdictions. In particular, management and executives are familiar with the legal provisions that are relevant to their respective activities.

4.1 DOCUMENTATION

We are committed to full and timely information and communication, both within the company and with our business partners. This also includes proper accounting and correct financial reporting. The documentation of business activities is organised in such a way that the true nature of business transactions, assets, liabilities and capital is clear. Entries in the books of account are classified and recorded properly and in a timely manner in accordance with the applicable accounting standards. No records, reports, entries or documents may be falsified, distorted, misleading (whether intentionally or unintentionally), incomplete or suppressed. Improper accounting, documentation or financial reporting violates this principle. Established internal control standards and procedures must be observed and complied with to ensure that financial records and reports are accurate and reliable.

4.2 CARTEL LAW

Functioning and unfettered competition is one of the cornerstones of our social and economic system. FWTM is fully committed to fair competition and fair contract design and expects the same from all of its partners. We strongly oppose any distortion of competition by companies and industry associations.

4.3 PREVENTION OF MONEY LAUNDERING

Money laundering refers to the process by which funds from illegal sources are incorporated into legal financial flows, or legal funds are used for illegal purposes. In order to ensure that FWTM is not involved in money laundering activities, it is essential to verify the identity of customers or business partners in suspicious cases. Any transaction that may raise suspicions of money laundering must be rigorously rejected.

4.4 PREVENTION OF CORRUPTION

Employees may not demand, accept, offer or grant any direct or indirect personal benefits in connection with their work. This applies in particular to the initiation, awarding or processing of contracts, whether with a private individual, a company or a public institution.
In particular, the granting of an advantage becomes inadmissible if the nature and extent of the advantage granted is likely to improperly influence the actions and decisions of the recipient.
When awarding contracts, all applicable regulations of public procurement law and internal policies and operating procedures, in particular FWTM's Compliance Guidelines, must be complied with. If contracts are concluded with consultants, intermediaries or comparable third parties, it is important to ensure that they do not offer, grant or receive any unlawful advantages in connection with these transactions.

In case of doubt, the relevant superior must be consulted, who in turn will check with management if there are any uncertainties in the assessment of the facts. This is further detailed in the FWTM Compliance Guidelines.
Corrupt behaviour by FWTM employees will not be tolerated. Any involvement in or toleration of any form of corruption is prohibited.

5. CONDUCT IN BUSINESS TRANSACTIONS

5.1 GIFTS AND INVITATIONS

It is prohibited to demand, promise or accept
direct or indirect benefits of any kind in connection with work for FWTM or any of its associated companies. This includes in particular accepting rewards and gifts. This special obligation also applies after termination of employment. Benefits in this sense include gifts of money, vouchers, concert tickets, entrance tickets, the granting of favourable conditions to employees and their relatives in transactions of any kind, participation in free or obviously heavily discounted training events, free or obviously heavily discounted provision of accommodation and services of any kind provided by the donor or others on his or her behalf, free or obviously heavily discounted carpooling, invitations to meals or similar. This list is not exhaustive. There are narrow exceptions to this prohibition, which are further detailed in the FWTM Compliance Guidelines.

5.2 DATA PROTECTION

Protecting confidential information and personal data is a top priority at FWTM. All employees are therefore required to use sensitive information only within the course of their duties and to protect it in accordance with legal requirements and internal policies. This applies both to the handling of company data and to the personal data of our customers and partners.

5.3 SOCIAL MEDIA

Social networks are very important in public discourse. We also use social media to communicate with our employees, business partners, customers and the public. As an international and cosmopolitan company, we value integrity, appreciation and respect, as set out in our company principles.

5.4 POLITICAL REPRESENTATION OF INTERESTS

As an associate of the City of Freiburg, we have many political representatives on the Supervisory Board, which means dialogue is essential. In order to avoid even the appearance of undue influence, FWTM applies the following principles of political neutrality:

- FWTM is committed to political neutrality. As a matter of principle, FWTM must refrain from making any donations to office-holders, elected representatives, political parties or organisations or foundations with close ties to political parties.

- FWTM does not employ any managing directors or executives who hold public office on a full-time basis or who work as elected representatives on a full-time basis, nor does it conclude any consultancy contracts or similar agreements with such persons.

- FWTM expressly recognises the shared responsibility of companies and their employees for the development of the common good. Employees' civic, political-democratic and social involvement is encouraged. Employees who engage in such activities do so as private individuals. FWTM does not pursue any commercial interests in this regard.

5.5 COOPERATION WITH AUTHORITIES AND PUBLIC BODIES

FWTM maintains a cooperative and open relationship with all competent authorities and public bodies. This does not conflict with protecting the rights of the company and its employees in the event of a government investigation.

5.6 SPONSORING

Sponsoring is based on the principle of reciprocity and partnership. FWTM sponsors projects, events, associations or institutions that are clearly related to its mission. However, sponsorship may not be used to indirectly gain unfair advantages from business partners. Rigorous scrutiny ensures that such sponsorships are not a covert attempt at bribery. Further details are set forth in the FWTM Sponsorship Policy.

6. COMPLIANCE WITH THE CODE OF CONDUCT

6.1 SCOPE OF APPLICATION

The Code of Conduct applies to FWTM and its associated companies. This includes all companies in which FWTM directly or indirectly holds a majority interest, in particular Freiburg Management und Marketing International GmbH (FMMI) and FWTM Kopfbau Vermögensgesellschaft mbh & Co. KG (FKV).

All employees of the companies are bound by the Code, regardless of their position in the company, as is management. The Code of Conduct forms the basis for further company regulations

and covers both official company matters and all areas in which employees are recognised as representatives.

This Code of Conduct is permanently available to all employees via the intranet (Idefix). FWTM offers its employees the use of all necessary sources of information and advice from Human Resources to avoid infringements of the law. Additional advice on the aforementioned principles of conduct can be obtained from the respective superior.

6.2 FWTM'S EXPECTATIONS OF EXECUTIVES

The individual managing directors and all executives at FWTM have a special responsibility for the implementation of and compliance with this Code of Conduct. They foster a working environment based on trust and cooperation and set an example of integrity and ethical behaviour. Monitoring compliance with the Code of Conduct is an ongoing task for every executive. All employees are called upon to actively participate in the implementation of these principles and to live the values of FWTM.

Executives encourage open dialogue, support employees,
accept opinions without prejudice and evaluate them fairly and objectively. Attempts at intimidation and reprisals against employees who report actual or suspected misconduct in good faith will not be tolerated.
Every executive ensures that his or her area of responsibility meets the requirements of these principles of conduct.

6.3 HANDLING VIOLATIONS OF THE RULES

Adherence to the principles set out in this Code of Conduct requires an awareness of the legal limits of one's own actions and the willingness to have those actions measured against legal and moral standards. Violation of these principles will not be tolerated. All employees are called upon to review and correct their own behaviour to ensure compliance with the above standards.

Violations of the internal regulations on which the Code of Conduct is based (employment/service contracts, company agreements, compliance guidelines, operating procedures, rules of procedure, shareholders' agreements, legal system, etc.) will not be tolerated and may result in disciplinary measures, including termination of employment. FWTM approaches every report with sensitivity and impartiality to ensure a fair and reasonable investigation.

6.4 SUPPORT AND ASSISTANCE

Open and transparent communication is an essential part of our corporate culture. FWTM encourages all employees, customers and business partners to raise any concerns, suggestions or

violations of this Code openly and without fear of negative consequences. There are communication channels in place to ensure that concerns are dealt with in a safe and constructive manner.

Any matters related to the Code can be reported to the relevant superior or the HR department, or sent to the following email address: compliance@fwtm.de.