



Code of Conduct



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# Introduction

Dear colleagues

Our business partners and customers see us as a highly reliable and respected partner. We have earned this reputation over several decades by the quality of our services and the respectful manner in which we treat our business partners. We have always - in line with our philosophy - combined our business demeanor with ethical principles.

As an internationally active service provider for events, trade fairs and exhibitions, we expect our employees to respect local laws, and to comply with and act by the principles of our code of conduct.

The following document reflects the NUSSLI image and the company's obligations in terms of business conduct. It shall serve as a guideline according to which we wish to model our actions in our dealings with customers, suppliers and business partners.

This code of conduct has been created to ensure that we will have every reason to be proud of our employees, our enterprise, and the goals we achieve now and in future.

The NUSSLI Group Management

## Basic Behavior and Conduct of NUSSLI Employees

In line with our philosophy, we are working toward a sustainable and profitable development of our business activities. In our efforts, we will be guided by the principles set out by our executive management, by legal requirements, and by our obligations in terms of social and community responsibility. We will maintain fair and truthful communication amongst ourselves, as well as with our business partners and public authorities.

### **Company Values**

The reputation of NUSSLI as an enterprise is determined by the actions and the behavior of each and every one of our employees. We are fully aware of the fact that reliability and trustworthiness form the foundations for our continued success. That is why we only make promises we can keep, and make good on promises we make. We expect our employees to adopt an entrepreneurial approach and to act responsibly in everything they do. We select our business partners carefully and expect them to act according to our own values.

### **Personal Responsibility**

The relationships of all NUSSLI employees are characterized by mutual respect, openness, and honesty. We respect the dignity, privacy, and rights of all individuals. We work with people of various nationalities, cultures, religious backgrounds and color of skin. We will not tolerate any form of discrimination, harassment or insults.

### **Mutual Respect**

**Lawful Conduct**

In the course of our business activities, we will comply with all legislation of the regions and countries in which we carry out our activities. We will conduct our business in a manner that allows us to be an exceptional employer. We respect and abide by the principles set down by the International Labour Organization (ILO) in its Declaration on Fundamental Principles and Rights at Work, in accordance with national laws.

**Commitment to Quality and Safety**

We are very much aware that our company is measured by the quality and safety of our products and services. We want to attain the highest possible standards in quality and safety, and are committed to working continuously to improve our products and services. We set ourselves the highest quality standards from the development to the engineering and ultimate installation and safe utilization of our products.

**Respect for Property**

Employee use of company assets is solely for the implementation of tasks assigned to them. We treat assets with the necessary care and caution to prevent damage, theft, or loss. We will not sell or purchase assets of or for the company unless expressly approved in writing by a supervisor or the relevant business management.

## Conduct in Contacts with Business Partners

NUSSLI strictly prohibits the offering, receiving or demanding of bribes in any form. We do not tolerate corruption in any form and expressly refer to the "ICC Rules of Conduct to Combat Extortion and Bribery". We are committed to fair play in compliance with applicable antitrust and competition legislation. We respect the interests of customers and their representatives.

**Competition Law,  
Bribery and Cor-  
ruption**

Employees must compare conditions objectively and evaluate offers universally, when selecting a supplier. There must not be any discrimination or bias regarding individual suppliers, and the selection process must reflect the best interest of the company regardless of personal preferences of the individual employee. Employees must not exploit their role as a buyer for the company to pressurize business partners into disclosing business practices or specific knowledge.

**Supplier Relations**

Employees shall at all times serve customers in good faith, and utilize their skills and competences to the utmost in responding to queries and complying with contractual agreements. Any employees with a special relationship (bias, conflict of interest) to a particular customer must consult their immediate supervisor and act in the best interest of the company. All employees must comply with local and any other applicable laws. Specific attention must be given to full compliance with public procurement legislation.

**Relations with  
Customers & Pub-  
lic Authorities**

## **Donations, Sponsorship, or Special Benefits**

Donations are decided in terms of the social responsibility of the company within its environment and are therefore the decision of local management. Project-related sponsorship should benefit business directly; decisions regarding sponsorship are governed by our policy regarding sponsorship services. These decisions are made on a case-by-case basis by the relevant business unit and are to be reported in accordance with management system requirements.

Employees must take particular care regarding their behavior when dealing with persons involved with politics or public authorities. No special benefits (e.g. sums of money, goods, invitations or other extraordinary benefits) must be given, offered, or promised, which might breach applicable laws, our own code of conduct, a contract, or other similar requirements published by state offices or organizations.

## **Giving & Receiving of Gifts**

Employees must not offer gifts to business partners or customers if the offer could be deemed inappropriate in accordance with generally acceptable common sense. Employees must not suggest to business partners who have any direct influence on decisions regarding an upcoming business relationship that they should offer gifts or money or any other commodity as an incentive.

Should a business partner or third party offer a gift that could in generally accepted common sense be construed as inappropriate, then the employee is required to report the matter to his immediate supervisor and request relevant instructions on how to proceed.

Furthermore we refer to our policy for gifts and invitations.



## Handling of Information

We will comply with applicable laws and regulations regarding the protection, use, and forwarding of confidential and personal information, and act in accordance with NUSSLI Group policy on information technology.

We will provide accurate and reliable reports and documentation to the board of directors, business management, investors, public authorities, and other official bodies. All official documents issued on the business activities of NUSSLI must be complete and accurate without any limitation.

All information gathered and documents created in connection with our business activities will be handled confidentially, and we shall not make these available to third parties (unless officially authorized to do so) nor shall we utilize them in any inappropriate manner.

We will utilize information about our customers and suppliers only in compliance with applicable laws and regulations and/or in accordance with mutual agreements. This information includes specifically knowledge of contractual stipulations, financial information and technical data, unless this same information is available via publicly accessible sources.

## **Data Protection & IT Security**

## **Confidential Information**

**Intellectual Prop-  
erty**

When dealing with the intellectual property of NUSSLI Group, we will ensure that the information is protected from misuse by other companies or individuals. Our employees will furthermore not use such information for personal gain or the benefit of third parties during or after their employment with us.

Similarly, we shall not endeavor through unfair practice to access or illegally utilize the intellectual property of other companies or individuals. We will ensure the correct handling of registered trademarks, logos, and copyrights of third parties.

## Conduct with Regards to the Environment, Safety and Health

Workplace safety and health are important components of our business activities and are deeply rooted in our philosophy. It is our responsibility to ensure all necessary measures for the best possible protection of our employees against accidents and any other dangers at the workplace. The same applies for the planning and equipment of workplaces, for materials handling at storage locations, and for processes at construction sites during the installation or removal of our structures. We will train our employees regarding essential safety measures and ensure their implementation.

We are aware of the fact that entrepreneurial activities will always have an impact on the environment. That is why we want to ensure the careful and non-wasteful use of natural resources in all our services. This policy includes the entire service provision process from the initial planning phase and procurement to final implementation.

### **Workplace Safety and Health**

### **Environmental Protection**

# Implementation

This Code of Conduct has been developed to ensure group-wide compliance with the same guidelines. The Code of Conduct will be implemented as of December 1, 2013 and will apply for all employees of NUSSLI Group. Any changes to the Code of Conduct will be communicated in writing. The latest version will be available via the NUSSLI QM system. Any documents and instructions referenced in the Code of Conduct will similarly be available via the QM system.

Every employee will - at the time of employment start and/or periodically – be made aware of the importance of compliance with the Code of Conduct.

The Code of Conduct Commission (CCC) will be responsible for the implementation, induction, and upkeep of the code, and compliance therewith. The CCC will furthermore be responsible for answering any questions regarding the Code of Conduct, and also for the processing and investigation of breaches. Any sanctions based on the findings of the committee shall be the responsibility of the superiors.

The CCC consists of the Compliance Officer (CO) for NUSSLI Group and three members of the executive management. The CCC reports to the Board's Reputation & Management Development Committee. The CCC will appoint a Compliance Responsible (CR) for each country company.

Any queries or issues regarding the Code of Conduct, as well as reports of breaches of the Code of Conduct can be addressed to local management, the local Compliance Responsible (CR), or any of the contacts listed below at any time. Should reporting to these contacts not be an option for any reason, then employees should utilize the Whistleblower Office in accordance with our NUSSLI QM system.

## **Code of Conduct Commission (CCC) Contact**

*Head of Human Resources NUSSLI Group*

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# Explanatory Notes

A number of case scenarios have been developed for a better understanding of the Code of Conduct and to facilitate its introduction and implementation. These are provided primarily for training purposes, and are accessible via the management system.

The digital version of the text may use hyperlinks or underlined terms to reference instructions and documents, which are similarly available in the management system (NUSSLI QM system). These form an integral part of the Code of Conduct.

For the purposes of the Code of Conduct, the term "employees" refers to temporary and permanent staff, as well as elected representatives of NUSSLI Group. The term "business partners" refers to customers, suppliers, sub-contractors, and other companies and institutions with which NUSSLI Group conducts business. The Code of Conduct is available in the languages German, English, Italian, Spanish, and Czech.

## Appendices

We refer to applicable legislation and requirements in the various countries. International organizations furthermore publish a number of applicable treaties and recommendations. Below you will find a list of key publications of this type:

- ILO (International Labour Organization) declaration of principles regarding multinational enterprises and social policy, together with the Declaration on Fundamental Principles and Rights at Work (1998)
- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises (2000)
- ICC (International Chamber of Commerce) Rules of Conduct to Combat Extortion and Bribery: ICC Rules of Conduct and Recommendations (2005)

NUSSLI Group attaches great importance to compliance with these guidelines, and expects the same from all business partners.