

Code of Conduct

NUSSLI Group

1	Introduction	2
2	Basic Behavior and Conduct of Employees	3
2.1	Company Values	4
2.1	Personal Responsibility	4
2.1	Mutual Respect	4
2.1	Lawful Conduct	4
2.1	Commitment to Quality and Safety	4
2.1	Respect for Property	4
2.2	NUSSLI Spirit	5
3	Conduct in Contacts with Business Partners	6
	Competition Law, Bribery and Corruption	7
	Supplier Relations	7
	Relations with Customers, Public Authorities	7
	Donations, Sponsoring or Special Benefits	7
	Giving and Receiving of Gifts	7
4	Handling of Information	8
	Data Protection and IT Security	9
	Confidential Information	9
	Intellectual Property	9
5	Conduct with Regards to the Environment, Safety and Health	10
	Workplace Safety and Health	11
	Environmental Protection	11
6	Implementation	12
7	Explanatory Notes	13
8	Appendices	14
9	Code of Conduct Contact	15

1 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 a leading global supplier, we contribute to ensuring that emotions can be experienced first-hand in sports, cultural and business events. 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

2 Basic Behavior and Conduct of NUSSLI Employees

Company Values

Personal Responsibility

Mutual Respect

Lawful Conduct

Commitment to Quality and Safety

Respect for Property

2.1 Basic Behavior and Conduct of NUSSLI Employees

Company Values

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.

Personal Responsibility

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. Therefore we only make promises we can keep and do keep our promises. 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.

Mutual Respect

The relationship between 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 skin colors. We will not tolerate any form of discrimination, harassment or insults.

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 the Board of Directors, the management or the superior according to the applicable regulations and instructions.

2.2 NUSSLI Spirit



We have been living the NUSSLI spirit for 80 years. It shapes our relationship with stakeholders and represents the core values of the NUSSLI brand:

Performing.

We are flexible, fast and highly motivated entrepreneurs. Our business is successful.

Multinational.

We are open to different cultures and value working in diverse teams. Our reach is global.

Interactive.

We enjoy strong internal, external, digital, national, international and wider industry networks. Our relationships are excellent.

Sustainable.

We recommend and choose ecologically sound concepts. Our activities put people and nature first.

Reliable.

We do what we say, keep our promises and never let you down. Our behavior is based on integrity.

3 Conduct in Contacts with Business Partners

Competition Law, Bribery and Corruption

Supplier Relations

Relations with Customers and Public Authorities

Donations, Sponsorship or special Benefits

Giving and Receiving of Gifts

3 Conduct in Contacts with Business Partners



Competition Law, Bribery and Corruption

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.

Supplier Relations

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.

Relations with Customers and Public Authorities

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.

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 and 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 "Summary of the Regulation of Expenses for the NUSSELLI Group" including customer gifts.

4 Handling of Information

Data Protection and IT Security

Intellectual Property

Confidential Information

4 Handling of Information



Data Protection and IT Security

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.

Intellectual Property

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.

Confidential Information

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.

5 Conduct with Regards to the Environment, Safety and Health

Workplace Safety and Health
Environmental Protection

5 Conduct with Regards to the Environment, Safety and Health

Workplace 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.

Environmental Protection

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.

6 Implementation

This Code of Conduct was first implemented on December 1, 2013 to ensure group-wide compliance with the same guidelines. On January 25, 2021 the Code of Conduct has been revised. It applies for all employees of NUSSLI Group. Any changes to the Code of Conduct will be communicated in writing.

Every employee will – at the beginning of his/her employment start and/or periodically during the employment – be made aware of the importance of compliance with the Code of Conduct.

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

Any queries or issues regarding the Code of Conduct, as well as reports of breaches of the Code of Conduct can be addressed to the superiors, the Group Management, the CEO, the Board of Directors or any of the contacts listed below at any time. Should, for any reason, reporting to these contacts not be an option, then employees should utilize the Whistleblower Office as stated in the regulations "Whistleblowing in the NUSSLI Group".

7 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.

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

8 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 Cooperation 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.

9 Code of Conduct Contact

Do you have questions about the Code of Conduct? Feel free to contact:
The Board of Directors, our CEO or a member of the NUSSLI Group Management