



Corporate Compliance Program (as of June 16, 2025)

The corporate compliance program of Hamburg Messe und Congress GmbH



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Hamburg Messe + Congress

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Dear employees,

Recognizing the importance of ethical conduct and legal compliance, Hamburg Messe und Congress GmbH (HMC) is committed to conducting its business practices in accordance with applicable regulations and the highest standards.


This Corporate Compliance Program serves as a guide for us as CEOs, all employees and partners, with the aim of ensuring integrity, transparency and accountability in all corporate activities.

With this corporate compliance program, HMC also aims to motivate its employees to act responsibly and provide them with guidance.

Hamburg, January 17, 2024



Uwe Fischer
CEO



Heiko M. Stutzinger
CEO

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I. **COMPETENCE AND RESPONSIBILITY** ARE THE KEY TO SUCCESS. BOTH ALSO ARISE FROM COMPLIANCE WITH THE LAW AND ETHICAL BEHAVIOR.

The success of our company has many sources. In addition to expertise, a sense of responsibility on the part of all employees is one of them.

As a platform for innovation and networking, our aim is to sustainably increase the value of the company and to generate high added value in the interests of the shareholder, employees and society as a whole.

This objective is also reflected in HMC's strategic guidelines:

Aligning structural and process organization for the future
Expand clear market position and anticipatory customer proximity
Strengthening profitability and innovative strength
Consistently integrating sustainability.

As a subsidiary of the Free and Hanseatic City of Hamburg, HMC is also in the public spotlight and lives under the rules of the political arena. HMC wants to maintain and promote its good image. The company's business activities are based on the applicable legal framework, rules of coexistence and ethical standards that impose a wide range of obligations on the company and its employees.

This Corporate Compliance Program is intended to provide information on particularly important areas of responsibility. It is intended to encourage employees to seek advice in case of doubt.

Such advice can be expected, for example, from superiors and specialist departments (e.g. Legal, Internal Audit or the Compliance Officer). This applies in particular if others could be disadvantaged, if there is a risk of personal damage, if a high risk is involved or if the legal situation is unclear.

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II. **BASIS:**

THE APPLICABLE LAW / COMPANY-SPECIFIC REGULATIONS

HMC respects the applicable law and demands the same from its employees and business partners. In addition, HMC has laid down binding company-specific rules, which are summarized in the HMC organization manual. These include
e.g. also regulations on IT compliance and TAX compliance.

An unfavorable legal situation from the point of view of the individual or the company must not be ignored simply because it means more work, for example. The company respects applicable law. Unlawful behavior can cause a wide range of damage. In addition to economic damage, there is a risk of damage to our image and thus to our market position. The value of the company is also influenced by its reputation. Even the appearance of a violation of the law can influence public opinion and thus, for example, have a detrimental effect on the behavior of our customers and shareholders.

A company always acts through people. When it comes to upholding the law, the interests of the company and the interests of its employees are completely identical.

Every employee therefore has a duty to comply with applicable law and company-specific regulations, and every superior must ensure that their employees fulfill this duty. In-house training in sam® - including on the topics of occupational health and safety, data protection and compliance - must be carried out regularly by all employees.

The following principles apply when dealing with colleagues, customers, suppliers, other companies and authorities. They are intended to help transfer behavioral requirements in selected areas to daily work.

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This program aims to highlight key areas that are of particular importance in practice. Every employee is obliged to observe them. The rules take precedence over any conflicting instructions from a superior. In such a case, the advice of the specialist departments mentioned at the beginning provides security. The legal system as a source of behavioral requirements is supplemented by ethical principles. Ethics describe the basic social consensus on values that are essential for social behavior and fair and respectful treatment of one another. We are committed to this.

1. FAIR COMPETITION

NO VIOLATIONS OF PUBLIC PROCUREMENT LAW

As a contracting authority, HMC is fully committed to fair competition, in particular to strict compliance with public procurement law, and to fair contract design vis-à-vis its business partners. It is therefore mandatory to ensure that the awarding of contracts complies with public procurement law, e.g. to put services out to tender or to regularly obtain several tenders. This can effectively counteract one-sided dependency.

We expect the same from others. Even coordinated behavior, informal discussions or informal gentlemen's agreements that have the purpose or effect of restricting competition are prohibited. Even the appearance of such conspiratorial behavior must be avoided. Any disclosure of information about a bidder or its bid to another bidder in the context of a tender is also prohibited.

No information about customer relationships, prices, upcoming price changes, etc. may be exchanged with competitors. The company's own calculations or plans may not be disclosed to competitors. Exceptions may be made if the company acquires or sells an event or enters into a joint venture.

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This requires a non-disclosure/confidentiality agreement that clearly describes the objective of the transaction. The exchange of data must also be limited to the extent necessary to assess the meaningfulness of the transaction.

In addition, HMC has a "no donation policy"; HMC does not make donations as a matter of principle.

Consultancy agreements with former board members are generally not advisable in the interests of an honest and transparent corporate policy - if a conflict of interest exists - and should therefore be avoided. The aim is to avoid inappropriate benefits or a lack of consideration.

All sponsoring activities must be recorded in the form of a written contract, be intended for a justifiable business purpose and be in reasonable proportion to the consideration. Furthermore, the identity of the recipient and the planned use of the sponsorship contribution must be known and the reason and purpose must be legally justifiable and documented.

The Minimum Wage Act (MiLoG) has been in force since 01.01.2015. HMC guarantees to pay its contractors a wage at least equal to the minimum wage according to the MiLoG and to fully comply with the requirements of the MiLoG.

From a public procurement law perspective, HMC has already been subject to far-reaching obligations since the Act on the Minimum Wage in the Free and Hanseatic City of Hamburg and on the Amendment of the Hamburg Public Procurement Act came into force on June 10, 2013, which are consistently complied with (see "HMC self-declaration on minimum wages").

2. OCCUPATIONAL SAFETY

EVERYONE IS ADDRESSED

Every employee is jointly responsible for occupational safety in their area. Environmental, occupational health and safety regulations must be strictly applied.

A major problem in dealing with sources of danger is the decline in diligence over time, because compliance with safety regulations is often perceived as additional work and people develop the conviction that they can control the potential danger. In their own interest, but also in the interest of their colleagues and the company as a whole, every employee must be aware of how important it is to apply safety regulations consistently. Supervisors have an important role model function here.

3. PLANT SAFETY

DUTY OF CARE

As the operator of a place of assembly, HMC undertakes to ensure the necessary care in the operation of the building facilities, in particular compliance with the provisions of the Ordinance on Places of Assembly.

Systems require constant monitoring and maintenance. Employees must be thoroughly instructed, trained and supervised. Only if these measures are carried out can operational disruptions, accidents or incidents be avoided and, in such cases, the company is in a position to safely counteract criminal prosecution of those responsible for the operation.

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This also applies to service partners. They must also be thoroughly instructed, trained and supervised accordingly.

4. SEPARATION OF PRIVATE AND CORPORATE SPHERES: CONFLICTS OF INTEREST MUST BE AVOIDED

Every employee must separate their private interests from those of the company. Personnel decisions must also not be influenced by private interests and relationships. Possible conflicts of interest must be disclosed immediately. In the event of irregularities of any kind, the Internal Audit department must be contacted immediately by the relevant line manager.

BUSINESS RELATIONSHIPS WITH THIRD PARTIES: ONLY OBJECTIVE CRITERIA COUNT

Supplying companies are essentially selected according to the criteria of price, quality, reliability, technological standard, efficiency, sustainability and product suitability. Under no circumstances may personal relationships or interests influence the conclusion of a contract. Recommendations that HMC employees make to others must not be motivated by material or immaterial benefits.

Employees may under no circumstances directly or indirectly demand, accept, offer or grant a personal advantage in connection with official activities, in particular when initiating, awarding or processing a contract - regardless of whether with a private individual, a company or an institution under public law. This prohibition applies to all types of benefits. Exceptions exist only in the case of customary benefits,

i.e. symbolic and low-value occasional or promotional gifts such as mass-produced pens, writing pads or calendars on a conventional scale.

The value of promotional gifts should always be such that their acceptance does not place the recipient under any obligation.

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They must be selected according to the principle of avoiding any appearance of dishonesty or impropriety on the part of the giver and receiver. In case of doubt, the decision of the superior must be obtained.

When dealing with the authorities, their special regulations must be observed. Gifts abroad may be in line with custom and courtesy. Here, too, it must be ensured that this does not create any binding dependency and that the legal provisions of the country and abroad are observed. The superior must be informed of such gifts.

If an employee is confronted with such an offer, they must report this immediately to their line manager. The following always applies: Even if such behavior is observed elsewhere, this is not a justification for one's own misconduct.

DEALING WITH COMPANY PROPERTY:

NO USE FOR PRIVATE PURPOSES

No employee may use company equipment (e.g. technical devices, office materials, consumables, documents, files, data carriers) or workers for private purposes without the express permission of the responsible office. Company property may not be removed from the company's premises without the permission of the superior. Data, programs or documents may not be copied and removed from the company or brought into the company without permission.

PRIVATE ACTIVITY:

INTEGRITY IS ESSENTIAL - AVOIDING CONFLICTS OF INTEREST

Every employee must notify the People Management department of their intention to take up another employment relationship (secondary employment) - including as a freelancer - or their intention to actively engage in business activities. This applies in particular to the assumption of functions in companies with which HMC could have a business relationship or a competitive relationship.

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HMC welcomes private activities in associations, parties or other social, political or societal institutions, provided that such activities do not jeopardize the fulfilment of contractual obligations.

INSIDER KNOWLEDGE: A KNOWLEDGE ADVANTAGE MUST NOT BE EXPLOITED FOR PERSONAL GAIN

No employee may exploit internal knowledge about the company's plans - such as the intended acquisition of an event or the establishment of a foreign subsidiary - for the purpose of enrichment, whether directly or through a third party. No employee may pass on such knowledge to persons not involved in the specific project or to third parties.

Disclosure to other parties involved in the specific project may only take place on the basis of "need-to-know" in compliance with all applicable confidentiality regulations.

5. BEHAVIOR TOWARDS EACH OTHER:

**FAIRNESS AND RESPECT ARE
REQUIRED**

Every employee must know that their behavior is also attributed to the company and thus shapes its reputation both externally and internally. The company therefore expects each of its employees to treat their colleagues, superiors and third parties in a friendly, professional and fair manner.

The principle of **equal treatment** standardized in Article 3 of the **German Basic Law (GG)** already states that no person shall be unfairly disadvantaged, favored, harassed or marginalized because of their origin, skin color, nationality, origin, faith, gender, age, physical constitution or appearance (see also General Equal Treatment Act - AGG). This also applies to **sexual identity**.

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In the event of conflicts, the line manager and the People Management department must be consulted with the aim of finding an appropriate solution. Sexual harassment is prohibited. Every employee has the right to be protected against harassment. It is not decisive whether the harassing employee considers his or her own behavior to be normal or acceptable or whether the person concerned has an alternative.

The interaction of all employees must be characterized by trust. Communication is the basis of any decision-making process. Every employee must endeavor to incorporate as much of their own expertise and expertise available elsewhere in the company as possible into their decision-making process. In addition to the ability to work in a team, successful project work also requires personal initiative.

6. DATA PROTECTION AT THE WORKPLACE:

HANDLING FILES AND RECORDS - PROTECTION AND ORDER

All documents and data carriers belonging to a workplace must not fall into the hands of unauthorized persons and must always be kept under lock and key. Particular attention must be paid to compliance with data protection regulations. Computers must be protected by using and regularly changing passwords. It must be ensured that no unauthorized third party can access the data even if the employee is absent from the workplace for a longer period of time. No employee may make transcripts or copies of company business documents or files for purposes other than business purposes. With the exception of substitutes and superiors, there is no right of access to information that does not relate to their own work.

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Any targeted knowledge of messages addressed to others for reasons other than official business is therefore inadmissible. The secrecy of correspondence must be maintained for all personally addressed mail.

All records and files must be kept in such a way that representation is guaranteed at all times. This requires, among other things, complete, clear and comprehensible file management.

In the worst-case scenario, every written sheet of paper and every data carrier can fall into the wrong hands and then be used against our company. This must be taken into account when creating/sending documents, including e-mails. The Compliance Officer and Legal are available to clarify individual questions.

7. SUSTAINABILITY

HMC pays attention to sustainable business practices in its business operations. Sustainability is an integral part of its corporate strategy and forms the basis for strategic decisions

As a wholly owned subsidiary of the Free and Hanseatic City of Hamburg (FHH), HMC helps to implement the goals of the Senate. This is because, according to Hamburg's city economy strategy, the city economy has "a special responsibility and function, for example in shaping socially and environmentally compatible urban development, implementing the mobility and energy transition, promoting business and innovation [and] ensuring competitiveness". The city economic strategy serves as a "common compass for future action" in order to ensure sustainable economic activity not only in an economic sense, but also in a social and ecological sense. The vision of the city economic strategy is:

"We are shaping the future city of Hamburg - a sustainable metropolis in which a good life is possible for everyone."

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In this way, Hamburger Stadtwirtschaft, and therefore HMC, is making a contribution to the United Nations Sustainable Development Goals (SDGs), which serve as a global framework for action and a guiding principle for sustainable development. HMC is committed to sustainable action in all areas and considers this to be a fundamental component of its corporate culture. HMC's contribution to the SDGs is published on the company website.

In addition, the HMC is based on the FHH's climate protection policy. The central political instruments - the Climate Protection Act and the Climate Plan - continuously sharpen the ambitious targets.

HMC's energy policy principles can be found in the energy management handbook. They are essentially derived from the obligations

- ✓ legal compliance and ethical conduct in accordance with this Corporate Compliance Program,
- ✓ on the climate and energy policy of the FHH, on Hamburg's urban economic strategy and
- ✓ to participate in the global "Net Zero Carbon Events" initiative of the event industry and
- ✓ from HMC's strategic guidelines, which, in addition to sustainability, also include profitability and innovative strength as an integral part and basis for strategic decisions.

The introduction of a certified energy management system is intended to make a significant contribution to the environmental and climate protection goals by ensuring, among other things, that operations meet requirements and needs and are economical, that energy retrofitting and replacement obligations are met and that energy-efficient technologies, systems, components and devices are used.

8. BEHAVIOR TOWARDS AUTHORITIES:

COOPERATION IN SAFEGUARDING OUR RIGHTS

The company endeavors to establish a cooperative relationship with all relevant authorities.

and maintain a relationship characterized by openness.

It should not be forgotten that some authorities also have the task of punishing violations of applicable law. Such proceedings follow certain rules. These rules also include the right of the person concerned to legal assistance. Exercising this right and claiming the "privilege of silence" does not constitute an admission of guilt. Information should only be provided and files submitted after consultation with Legal. All employees authorized by the management who are responsible for compiling and transmitting information about the company to authorities or for other public communications of the company shall be provided with this information fully, openly, correctly, in good time and in an understandable form.

III. IMPLEMENTATION OF THE PROGRAM:

INFORMATION AND PROTECTION IN ADVANCE, SANCTIONS FOR NON-COMPLIANCE

The company offers its employees the use of all necessary sources of information and advice from Legal in order to avoid violations of the law.

Violations of the law are not tolerated. The company enforces compliance with the above rules. Violations may be punished with warnings, claims for damages or termination of employment. In cases of doubt, every employee can and must seek advice from the competent offices in the company mentioned at the beginning. It is not enough to simply take note of this program.

All employees are called upon to check their own conduct against the above standards and to raise their awareness with regard to compliant conduct.

Every supervisor must organize their area in such a way that reports of legal violations can always reach them. It must be possible to actively address grievances. However, supervisors must also carry out regular checks on their own initiative and seek discussions with employees. Information can be collected and delivered. This program is designed to ensure constant compliance with legal requirements. Its implementation also requires that knowledge of the legal requirements and compliance with them is made part of company training and further education. Only regular exposure to the subject matter will create the necessary awareness. The above principles must be practiced at all times.

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Their protection is based on the necessary sensitivity for the legal limits of one's own actions and the willingness to have these actions measured against legal standards. In detail, the following measures must be taken to implement this program:

APPOINTMENT OF A COMPLIANCE OFFICER

The Internal Audit department also performs the function of the Compliance Office. The Compliance Officer reports directly to the Management Board. The name of the Compliance Officer is publicized within the company. His or her tasks include supporting the implementation of the corporate compliance program, developing, communicating and implementing specific compliance measures and overseeing their implementation. The Compliance Officer also has the task of investigating reported compliance violations and initiating any necessary corrective measures. The Compliance Officer's other tasks include the management of current events; he is supported in this by Legal. The Compliance Officer reports to the Management Board and the Supervisory Board once a year on any compliance violations reported, investigations carried out and their results, measures taken and training measures initiated under this program.

NOTIFICATION OBLIGATIONS

All employees are required to report violations of this corporate compliance program immediately.

The [Hintbox](#) whistleblower system is available for this purpose.

However, such reports can also be made directly to the Compliance Officer or the respective superior. The report can also be made anonymously; however, this should only be done in exceptional cases in line with the corporate culture practised at HMC, which is characterized by openness and trust, among other things. All supervisors are obliged to monitor the activities of their employees with regard to possible violations of this program. The Compliance Officer must be informed immediately of any violations identified or reports made by employees.



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The Compliance Officer confirms receipt of the report within seven days, immediately starts reviewing the report and provides feedback to the whistleblower within three months.

In addition, employees also have the option of [contacting](#) the Confederation's external reporting office at the [Federal Office of Justice](#).

The company will ensure that no employee is disadvantaged in any way solely because of a report made in good faith. To the extent that a reporting party has itself participated in violations of this program, the company will take into account in any action against the reporting party whether the report or timely cooperation in the investigation of violations could have averted damage to the company.

INFORMATION

Every employee must be given this Corporate Compliance Program. If the Compliance Officer offers further training measures in consultation with the management, he will ensure that all employees affected by these measures are informed.

REVIEW

Internal Audit will review compliance with this program at regular intervals.
