

**Code of Conduct**  
**for Employees**  
**of artecom Veranstaltungen GmbH & Co. KG**  
as of: 12.11.2024

## Preface

Since 1992, artemcom has been successfully operating in the field of experience-oriented communication. As an event agency with a creative and dynamic team, we take pride in designing and implementing unique projects. Our daily actions are based on mutual respect, trust, and a sense of responsibility. To ensure these values remain firmly anchored in our everyday work, we have developed this Code of Conduct.

The Code of Conduct applies without exception to all employees as well as to the management. It defines clear behavioral and decision-making principles that guide us in our daily work. Adhering to these rules not only ensures respectful and appreciative collaboration but also strengthens the trust that our clients, partners, and colleagues place in us.

The Code of Conduct is more than just a collection of behavioral rules—it serves as a framework for a culture of integrity and responsibility. This culture shapes our professional collaboration with one another, as well as with partners, clients, and other stakeholders. Our goal is to create a work environment where everyone feels respected, and which radiates positivity externally as well.

As the Managing Director of artemcom, I commit myself not only to promoting these values but also to embodying and exemplifying them to the team. I firmly believe that our success is built on these principles and that they help us grow as a company in the long term while fostering sustainable relationships. Therefore, I encourage all artemcom employees to internalize these values and integrate them into their daily work.

*Roberto Rivera Carlson*

*Managing Director*

## (1) Equality / Diversity / Human Rights

- artemcom is diverse. We are committed to democracy, the European Union, and diversity. We reject right-wing extremism and all other forms of extremism.
- We respect human rights, personal rights, and the dignity of our employees and all third parties. Compliance with the applicable provisions of the United Nations Universal Declaration of Human Rights is a fundamental prerequisite for all our activities and relationships.
- Forced labor, child labor, all forms of modern slavery and human trafficking, as well as any form of exploitation, are strictly prohibited at artemcom. We ensure strict compliance with the relevant laws.

## (2) Guidelines for Internal Operations

- Everyone has the right to fair, dignified, and respectful treatment. artemcom is committed to diversity, inclusion, and equal opportunities, fostering a work environment characterised by respect, fairness, and tolerance, where everyone feels valued. Sexual harassment, discrimination of any kind, racism, bullying, abuse of power, intimidation, threats, or any other form of harassment are not tolerated.
- We do not tolerate discriminatory behavior for reasons such as ethnicity, nationality, skin color, appearance, gender, sexual orientation or identity, pregnancy or parenthood, marital status, age, culture, religion, worldview, disabilities, or any other legally protected characteristics.
- We reject anti-democratic attitudes.
- We comply with regulations ensuring fair working conditions, including wages, working hours, and privacy protection. Our remuneration systems are consistent and transparent, guaranteeing compensation that is market-competitive, function-appropriate, and performance-based. We naturally comply with statutory requirements regarding minimum wage, working hours, and vacation entitlements.
- We comply with the laws and regulations regarding occupational safety and health at the workplace, ensuring a healthy and safe work environment for our employees. Annual safety training is conducted, and equipment is provided to employees for their roles. Before every event, all involved teams and staff are briefed on safety-relevant aspects.
- We encourage our employees to work efficiently and responsibly, promoting the company's goals. To support this, we use a tailored inventory management system and a digital task management tool. Additionally, all employees follow internal work guidelines and process descriptions.
- artemcom provides its employees with IT, office, and communication equipment, as well as a fleet of vehicles and other resources for their duties. This company property is to be used responsibly, carefully, and cost-effectively by employees.
- artemcom ensures the security of its IT systems and protects them from unauthorized access or misuse.
- Necessary official permits for events, company operations, or employee activities are obtained before proceeding. If a permit is revoked or expires, the relevant activities are suspended until reauthorization is granted.
- We proactively identify and address conflicts of interest to avoid or disclose them. Our actions are always guided by the interests of artemcom and its employees.

### **(3) Data Protection / Communication**

- When collecting, storing, processing, or transferring personal data (e.g., name, address, phone number, date of birth, health information) of employees, clients, or other third parties, artemcom ensures utmost care, strict confidentiality, and adherence to applicable laws and regulations.
- Employees handling personal data receive advice and support from legal advisors or the data protection officer. Personal data must be handled responsibly and in compliance with legal requirements.
- Confidential information includes non-public information intended for a limited audience and not for internal distribution or external publication. This includes, for example, reports, contracts, financial data, personnel information, legal disputes, event concepts, and intellectual property.
- We protect trade secrets and confidential information, using them solely for the benefit of artemcom. This confidentiality extends beyond the termination of employment or business relationships. Using confidential information for personal gain is prohibited.
- As a company of integrity, artemcom ensures maximum transparency in all processes to facilitate optimal governance, control, and traceability of outcomes. All required records, documents, and reports are truthful, complete, and comply with applicable rules and standards.
- artemcom operates in accordance with the ISO 9001 quality management standard.
- When using social media, we remain mindful of our responsibility to protect the company's reputation, refraining from disclosing confidential or sensitive company information and respecting the privacy of fellow employees, business partners, and clients.
- Our communication and advertising are honest, transparent, and comply with applicable laws and regulations.

### **(4) Interactions with Clients, Suppliers, and Business Partners**

- We maintain fair and honest relationships with our clients, suppliers, and business partners. We treat them with respect and deliver high-quality services. In return, we expect our clients, suppliers, and business partners to treat us with the same respect and integrity we extend to them.
- Business decisions must always be made based on objective criteria and in the best interest of artemcom, considering the legitimate interests of our business partners.
- We guarantee fair and timely payment for services rendered. Respecting intellectual property is a matter of course for us.

### **(5) Compliance with Applicable Laws**

- Compliance with all applicable laws and regulations is a matter of course for artemcom. This ensures the sustainability of our business success. We tolerate no bribery, corruption, money laundering, or insider trading.
- Relevant legal provisions are listed in our legal register.
- Violations of applicable laws or regulations can have serious consequences for both artemcom and its employees, including criminal charges, employment-related consequences, claims for damages, or reputational damage.
- We investigate all reports of violations, address them promptly, and take appropriate action.

## (6) Market Conduct and Competition

- artemcom is committed to the principles of fair competition and complies with applicable antitrust and competition laws.
- In almost all countries, relationships and agreements with competitors, suppliers and sales or trading companies that impair fair competition are prohibited by law. This includes, for example, price fixing, the division of customers or sales territories between competitors, anti-competitive boycotts and other unfair competition methods.
- If there is any doubt about the legal admissibility of a behaviour, the relevant legal advice must be sought.
- We will immediately put a stop to any offences.

## (7) Invitations, Gifts and Other Personal Benefits

- artemcom does not tolerate any form of bribery or corruption, whether involving public officials or in dealings with business partners.
- Benefits in the form of invitations or gifts are permissible under certain conditions if they are related to promotional activities or serve the purpose of fostering business relationships or presenting products or services. Small gestures from customers to artemcom employees or from artemcom employees to customers are generally acceptable.
- In the context of a public tender or dealings with public officials, it is advisable to check with the respective officials beforehand whether planned invitations (e.g., to lunch, which must also fall within the boundaries of appropriateness outlined above) are approved by their employer.
- Any invitation extended to third parties with a business connection must be transparently recorded and documented in books and records.
- Donations and sponsorship activities are generally allowed but must not be used to illegally gain business advantages. artemcom refrains from any form of concealment of benefits that could create corruption risks.

The following actions are **always** unacceptable:

- Gifts sent to private addresses
- Cash gifts or vouchers
- Gifts during contract negotiations

## (8) Quality Assurance / Fair Trade

- artemcom maintains high-quality standards in its services, but not at the expense of business partners and subcontractors.
- artemcom values mutual respect between management and employees, as well as in dealings with business partners and customers.
- artemcom makes purchasing decisions fairly and with integrity based on objective criteria such as quality, price, service, reliability, availability, technical performance, contract fulfillment, resource and energy efficiency, and environmental sustainability.
- artemcom is committed to preventing and avoiding human rights violations throughout its supply chain.

## **(9) Environmental Protection / Sustainability**

- Our commitment to the environment is reflected in all our activities and decisions.
- artecom complies with all applicable environmental regulations as well as internal environmental guidelines, such as those concerning climate protection and material procurement.
- We strive to continuously improve resource and energy efficiency in the production and distribution of our products and services while minimizing negative environmental impacts.
- We procure and use scarce resources such as energy and water responsibly. We promote recycling and the circularity of products and materials wherever possible.

## **(10) Open Dialogue / Reporting Violations**

- Openly addressing concerns is crucial in reducing misconduct or ensuring it is identified and corrected early. artecom encourages free and critical thinking and values an open environment where employees can approach their supervisors or management without hesitation, even with critical matters. Leaders encourage open dialogue, support their employees, and investigate expressed concerns fairly and without prejudice.
- Attempts to intimidate or retaliate against employees who report actual or suspected misconduct in good faith will not be tolerated.
- Submitting reports in bad faith, with the intention of falsely accusing another person, constitutes a compliance violation and will have appropriate consequences.
- Leaders and employees in positions of responsibility for ensuring compliance are required to promptly report any concrete indications or suspicions of significant compliance violations. All other employees are called upon to do the same.

## **Closing Statement**

This Code of Conduct reflects our shared values and principles. We communicate it internally to all employees and externally to all stakeholders.

We will review and update it regularly to ensure it meets current standards and needs. We are all committed to respecting and living by it in all our activities.