

A light blue outline of a pentagon is positioned to the left of the main title. The background of the entire slide features a pattern of overlapping, semi-transparent pentagons in various shades of blue.

# OUR CODE OF CONDUCT

Integrity wins. Always.

Our commitment to our employees & business partners.

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# A message from our CEO.

Infront is a global leader in shaping the future of sport. We have a rich heritage in delivering the best service for our clients, and that heritage has been built by our people. We are trusted by rightsholders, sponsors, broadcasters, event participants and many other stakeholders to deliver and operate according to high ethical business standards and the expectations we place on our own service is the result of several decade's worth of the best event delivery in the industry. To ensure the sustainability of our organisation we need to constantly conduct our business in an ethical and transparent manner.

Our values are designed to drive towards our purpose: to unite people in sport. For that to happen we need to be united ourselves whilst also showing passion, taking initiative, having a positive mindset and - most importantly - acting with integrity.

Integrity is one of our core values and one of the guiding principles in how we conduct our everyday business. This Code of Conduct ("Code") reflects what's important to us.

It is an entry point to all the laws, regulations and company policies that apply to the work we do.

But it goes beyond that.

Working with our Code is about creating an open and honest environment, allowing us to achieve our best work in a legal and sustainable manner. It allows us to be proud of our achievements and how we overcome our challenges and succeed.

This Code is designed to reassert what is expected of you as an Infront employee, acting as a resource and first entry point to guide your future actions. It is our ethical charter; our constitution and its basic principles are specified in our policies and Q&A papers available on the **Digital Compliance Platform** that you can access via **The Bench**.

Let's continue shaping the future of sport together with integrity,



**Philippe Blatter**  
President & CEO  
Infront Sports & Media AG



# INTRODUCING OUR CODE



## Who is the Code for?

Everyone at Infront must adhere to the Code - from the members of the board of directors to each line manager and employee - and help prevent or detect, and respond to its violations. We are all obliged to personally live up to the high ethical standards we have set for ourselves, and we expect the same from our business partners.

No matter what job you do or where you do it, you are Infront. Keep that in mind as you watch over every business relationship, every deal and every event and make sure your actions always reflect our values. Follow our Code and policies as well as the laws and regulations of the country (or countries) where you work to protect what we've built.

**ATTENTION: SPEAK UP!**

## Do not ignore violations and misconduct!

Speak up! By asking questions and reporting concerns, you are doing the right thing and helping Infront stop or prevent misconduct.

As a line manager encourage employees to come to you with questions or concerns. Listen to them carefully and offer guidance when they need help, including identifying available channels for reporting.

**Infront does not retaliate nor does Infront tolerate retaliation against anyone who raises a concern under this Code or assists in an investigation and has reasonable belief that the information is true.**



## Do this self-check when you have a bad gut feeling!

The best way to check if your decision/ action is the right one is to ask yourself:

**How would I feel if this would be published in the newspaper tomorrow?**

**OR: What would your mother say?**

If you cannot answer these questions with "that would be totally fine" then you should reconsider your decision / action.

# Making the right decision.

## Doing the right thing is our goal

If the right thing to do is not clear, ask yourself:

- Is it legal?
- Does it reflect our values?
- Is it good for Infront as a whole - not just a certain individual or group?
- Would I feel okay if everyone knew about it?

If you can answer "YES" to all of these questions, it's probably safe to move forward. But a "NO" or even a "MAYBE" to any of them should cause you to stop and reconsider. It's always appropriate - in any situation, under any circumstances - **to ask for help.**

## Whom to contact?

**Your line manager or someone from senior management** is your first point of contact and always available to answer questions.

**Your Compliance Desk** is available for any type of question related to the Code and related policies.

**The People Abteilung** can explain and answer questions about employment policies, benefits and workplace issues.

**The Legal Team** can help explain and interpret this Code and can provide guidance about how to conduct business on behalf of Infront in compliance with the law.

**The [Speak Up Line](#)** is an online platform where you can raise your concerns on an anonymous basis if requested.

**Find out more about the [Speak Up Line](#) in the [Speak Up Policy!](#)**



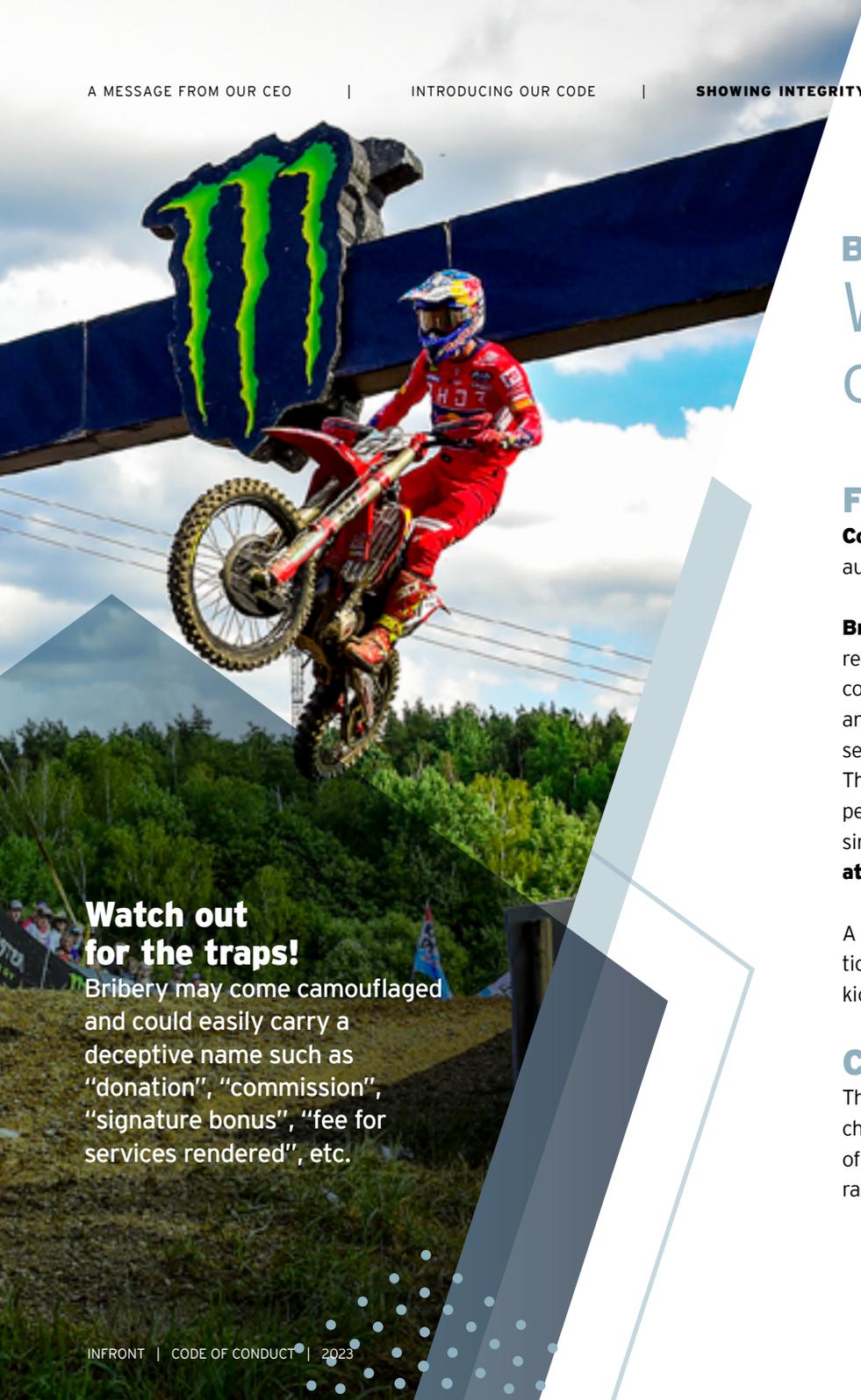
## What happens if I do not follow the Code?

Even a seemingly minor violation of this Code could expose Infront or individual employees to serious repercussions - from reputational harm to fines or even imprisonment. So, use this Code to also protect yourself and your personal integrity!

We take all potential Code violations seriously. Code violations may lead to disciplinary action that matches the nature and circumstances of the violation, up to termination of employment. If an act violates the law, it could result in criminal prosecution, fines and/or imprisonment.

# SHOWING INTEGRITY





## Watch out for the traps!

Bribery may come camouflaged and could easily carry a deceptive name such as "donation", "commission", "signature bonus", "fee for services rendered", etc.

## Bribery and corruption

# We never tolerate any form of bribery or corruption.

### Facts

**Corruption:** Abuse of a position of employment, authority or trust to gain an improper advantage.

**Bribery:** Anything of value offered, promised, given, rewarded or provided in order to gain a commercial, contractual, regulatory or personal advantage. Bribing any individual is illegal everywhere and comes with severe consequences for Infront and its employees. The laws in some countries even impose bigger penalties for bribing public officials, but for us, it's simple: **bribery of anyone, at any organisation, at any level is always wrong.**

A bribe can take other forms than cash including gifts, tickets, entertainment, travel, job offers, sponsoring, kickbacks and facilitation payments.

### Context

The sports sector has undergone comprehensive changes in recent decades. Globalization, a huge influx of money at the top level of professional sport, the rapid growth of legal and illegal sports betting and

marked technological advances have transformed the way sport is played and consumed. These factors have also had a major impact on corruption in sport, both in terms of its scale and its forms.

### How it impacts you

We all need to understand and live by the following:

- Never accept or offer any bribes or let someone else offer the bribe to anyone under any circumstances.
- Do everything you can to prevent bribery by others who conduct business on our behalf.
- Report any suspected, actual, attempted, or potential instances of bribery or corruption involving any Infront employees or our business partners.
- Before offering anything to a public official or making charitable donations align yourself with your line manager and the Compliance Desk.



## BRIBERY & CORRUPTION

### What if?

I am currently in contract negotiations with the head of a football association over media rights for a football league. He is keen to work with me and after another round of negotiating, I invite him to our holiday house in the south of France to finalise the negotiations in a more relaxed atmosphere with all expenses paid by myself.

After the deal is closed, I offer him to stay on for an extra week of holidays.

**Don't do it!** This is clearly considered as an attempt to inappropriately influence the head of the football association and would be defined as an act of (attempted) bribery. There is no business purpose behind this invitation, and it seems rather lavish than socially adequate.

## Can I invite business partners to Infront events?

A specific characteristic of Infront's core business is the use of our sports events, i.e., those commercialised, organised and/ or hosted by Infront (the so-called "Infront Events") as a promotional and marketing platform for existing and potential new business partners. For invitation to such Infront Events, specific rules apply. Check out our [Gifts & Hospitality Policy](#) for more information.

## Gifts and hospitality

We offer and accept gifts and hospitality for legitimate business purpose only and in a social adequate manner.

### Facts

Gifts, tickets, and entertainment broadly cover anything that is of value, is personal in nature and is offered, accepted, received, or provided to or by someone outside Infront. This includes meals, tickets, offers of paid-for travel, holiday gifts and other personal gifts.

### Context

An occasional gift, invitation to an Infront Event or offer of entertainment is often viewed as a normal part of doing business. But sometimes even a well-intentioned gift or offer can become problematic. It is never appropriate to offer, provide or accept gifts, tickets or entertainment with the intention or expectation to get something in return.

That is why we have a [Gifts & Hospitality Policy](#) in place - to identify the situations where an invitation or gift is appropriate, or where a more in-depth assessment is necessary because of certain critical circumstances.

### How it impacts you

As employees I need to use my common sense. Any time gifts, tickets, entertainment, or invitations to Infront Events are involved, I shall always ask myself:

- Is the gift, ticket, or entertainment rather excessive and disproportionate in value, given the circumstances?
- Is it being offered for something other than a legitimate business purpose?
- Are there ongoing negotiations between Infront and the provider or recipient?
- Could anyone view the gift, ticket or entertainment as creating an expectation of anything of value, including a business opportunity, in return?

If the answer to any of these questions is "YES," the gift, ticket or entertainment in question may require additional review. In such instances, contact the Compliance Desk for additional guidance.

Find out more in the [Gifts & Hospitality Policy!](#)



Find out more in  
the [Q&A about  
competition and  
antitrust law!](#)

## Fair competition

# We compete fairly and honestly - no matter what.

### Facts

Fair play is important in both sport and business. Therefore, everyone needs to abide by the rules of fair competition, which is protected and promoted by competition law. Competition law can be divided into three pillars:

- **Cooperation:** Prohibits anti-competitive agreements or coordinated conduct between independent companies.
- **Monopolisation:** Prohibits unilateral abusive conduct by companies with dominant market position.
- **Mergers:** Prohibits mergers and joint ventures that significantly impede effective competition.

### Context

The first pillar above is the most relevant for Infront. For example, gaining awareness of sensitive information may be the norm based on your role or responsibility at Infront, but make sure you treat that information ethically and lawfully. Sensitive information includes any information that can affect a competitor's conduct on the market by reducing uncertainty about another competitor's conduct.

Joint bids or discussing backing agreements with our business partners before entering a proposal to a tender can be seen as prohibited anticompetitive agreements.

Be careful and always seek guidance before you initiate any such discussion with a business partner.

### How it impacts you

Using integrity to balance business aims and ethical behaviour is vital when it comes to playing fairly.

We should:

- Follow all antitrust and competition laws.
- Seek guidance and communicate in close and constant consultation with your line manager, the Legal Team or the Compliance Desk any time there is a risk of violating them.
- Do not talk about our business strategies, pricing, calculations and plans with competitors.
- Never share information with or otherwise coordinate with any competitor or other third party to fix prices, divide any market or otherwise limit competition.
- Before initiating discussions about a joint bid or backing someone, seek guidance from the Compliance Desk.
- Always seek guidance from the Compliance Desk in tenders.
- Redirect or leave a conversation where sensitive information is shared by others.
- Do not share sensitive information obtained by third parties apart from your line manager or Compliance Desk when asking for advice how to treat such information.



## FAIR COMPETITION

## What if?

**I meet a competitor and good friend at an international sports fair. I discuss private matters first but all the sudden my friend starts sharing sensitive information about entering a new market.**

Try to redirect the discussion, otherwise leave.

**I plan to participate in a tender. To improve Infront's offer, I talk to a competitor and I evaluate to submit a joint bid. Is this illegal?**

Making an agreement with a competitor (that could in theory submit a bid on its own) is critical, therefore always seek guidance from the Compliance Desk when you are evaluating the option of a joint bid.



## Anti-Money laundering

# We never get involved or tolerate money laundering.

### Facts

Money laundering is a process where funds that originate from criminal activities - such as terrorism, drug dealing, human trafficking etc. - are introduced into the regular economy through legitimate businesses in order to hide the criminal origin. This requires vigilance in our actions. We are committed to conduct business in a way that prevents the use of our business transactions by those who might abuse them.

### Context

Money laundering activities are hardly obvious to recognize and regularly trigger questions that need to be addressed with business partners. We solely conduct business with reputable business partners who are involved in lawful business activities and whose funds are derived from legitimate sources.

### How it impacts you

Illegal activity like money laundering can be difficult to spot for many reasons. That is why it is imperative for us to:

- **Be alert** - Keep an eye and ear open for any suspicious activity involving third parties and flow of funds.
- **Make background checks** - Screen potential business partners, etc. or request the help of the Compliance Desk for those checks.
- **Identify red flags** - See a large cash payment or unusual fund transfer to or from foreign countries? Do business partners or suppliers provide incomplete information or avoid recordkeeping requirements? Raise it with your Compliance Desk immediately.
- **Avoid third party payments** - No payments of any kind should be made to a third party in any country other than the country where the event took place or in which the third party or supplier has a substantial place of business. Exceptions can be granted upon intense clarification of the Compliance Desk.
- **Speak Up** - If you see something, report it to your line manager and the Compliance Desk via the [Speak Up Line](#).

**ATTENTION: ANTI-MONEY LAUNDERING**

## Watch out for these red flagged requests:

- Transfer payment to or from entities or countries not related to the transaction.
- Process a transaction in a way that circumvents the normal process.
- Exchange many small-denomination bills for a large one.
- Make payments in cash.
- Invoices are issued with unclear or wrong service and/or deliverables description.

Red flags are a signal to ask more questions to better understand the transaction.

If it sounds suspicious, speak up - awareness is the key to combatting money laundering.



## Conflict of interest

We do not put our own interest before the interests of Infront – but if it happens, we are transparent about it.

### Facts

A conflict of interest exists when an employee's personal interest conflicts with, interferes with or takes preference over Infront's best interest. Conflicts of interest can arise in many circumstances, including when Infront employees have personal or business relationships with Infront's business partners. Conflicts of interest can also arise from personal or business relationships between Infront employees, including romantic relationships.

Employees' free time activities can also conflict with Infront's business interests. It isn't possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise.

### Context

It is your duty to make business decisions in the best interest of Infront. Being able to recognise a potential conflict of interest can help you avoid one. If a conflict arises, you must be transparent about it and disclose it via the **Digital Compliance Platform**.

### How it impacts you

We all want to succeed in every facet of life, but this needs to be balanced with the right approach to both work and play. We need to take the following into account:

- Avoid conflicts of interest wherever possible.
- Use good judgment and recognise when a personal or business relationship creates a conflict of interest or the appearance of a conflict of interest.
- Be transparent about a potential, perceived or actual conflict of interest and report it to your line manager and the Compliance Desk through the **Digital Compliance Platform**.

**ATTENTION: CONFLICT OF INTEREST**

## Typical conflict of interest:

- Own, operate or assist a company that competes with Infront or engage in any competitive activities.
- I engage in side-line work that competes with Infront and that prevents me from being able to fulfil my responsibilities at Infront.
- I directly or indirectly hold or acquire a stake in a competitor.
- I invest in a company that is being assessed by Infront as a possible investment object (e.g., start-ups from Infront Lab).
- I contract with a business managed or owned by a family member.
- I act as or accept a position as an officer, consultant or director of any business or organisation involved in the sports business.

Find out more in our **[Conflict of Interest Policy!](#)**

## CONFLICT OF INTEREST

## What if?

My sister is the marketing director of the international skateboard federation and me/my team want to submit a proposal to become marketing advisor for the federation. Shall I stop the process because of my family relations?

**No**, but submit a conflict of interest request on the **Digital Compliance Platform** and make sure to document and disclose your family relations. Your line manager and/or the Compliance Desk will assess the case.



## Practice good cyber security

Make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access.

## Privacy

# We protect personal information.

### Facts

Personal information is any information that could be used to identify someone, such as a name, telephone number or email address. This personal information may relate to our employees, our business partners, event participants (such as e.g., runners of a B2Run event) or other third parties.

There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose personal information and we strive to comply with those laws everywhere we operate.

### Context

The trust of our colleagues and business partners is important for us and critical to our business. Correctly handling and protecting personal information is key in building trust and protecting our brand. We comply with applicable laws and regulations within all jurisdictions in which we collect, store, and use personal information.

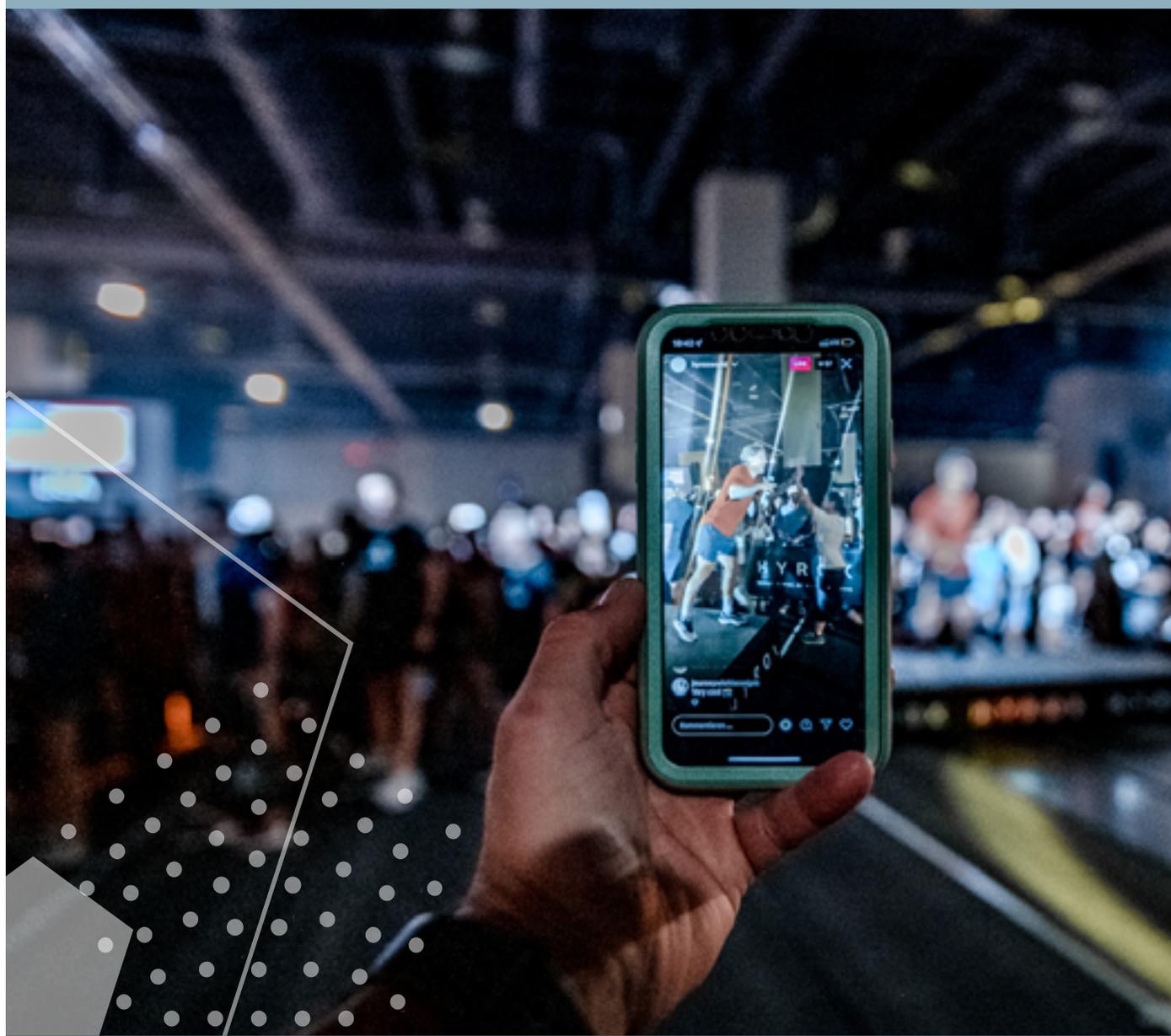
Failure to comply with those laws can have a severe impact on our company. Therefore, personal information should be collected only for legitimate business purposes and only to the extent necessary, shared only with those who have permitted access, protected in accordance with adequate security measures and retained only for as long as necessary.

### How it impacts you

In today's digital world it may seem easier than ever to gain access to an individual's personal information. As an organisation we need to ensure we are using that information in a responsible manner, so we all must:

- Immediately report any known or suspected unauthorised use or disclosure of personal information.
- Ensure personal information is not disclosed to unauthorised internal or external parties.
- If in doubt, ask your Data Protection Officer or Legal Team how to handle personal information.

**Find out more in our [Data Protection Policy!](#)**



## PRIVACY

### What if?

**A new vendor wants to say “hello” by sending everyone on my team a small gift. The vendor has asked me for a list of my co-workers’ names and private addresses. Is it okay to provide them?**

Before doing anything like this, contact the Legal Team (or data protection officer if available). Even if the intent behind the request is well-meaning, supplying this information would violate our commitment to keeping private information private.

## How we define business partners

Any party which has business contact with Infront and is not an employee or manager of the company is considered a business partner, including, without limitation our clients, suppliers/vendors, associated persons, investors, joint venture partners and so on.

## Selecting business partners

# We know our business partners.

### Facts

Infront relies on various business partners to help us execute our projects all over the globe. Anyone doing business with us, in some way or another, represents our brand and consequently, Infront's business partners can have serious impacts for Infront, from both a reputational and legal standpoint.

### Context

We value the contribution of our business partners to the success of our business as well as our reputation. To protect and enhance our reputation, we diligently choose business partners who will act in compliance and with integrity - consistent with this Code.

If certain risk factors occur, a background screening (also called due diligence) must be conducted. The screening aims at recognising risks related to business partners such as international sanctioning laws, corruption, money laundering risks or other reputational risks as early as possible and to minimise them by implementing respective measures.

### How it impacts you

Our business partners are an extension of the Infront brand. Employees who interact with them must ensure that they select and check our business partners in line with our principles and standards.



## SELECTING BUSINESS PARTNERS

### What if?

**I find out that a commission agent that supports us in selling a rights package for women's handball competitions not only receives the commission from Infront but also from the sponsor. Is that ok?**

Being paid by two parties for the same service is not appropriate and does not reflect an ethical workstyle.

In addition, it creates a blatant conflict of interest. This is a clear red flag that requires further analysis and investigation. Please get in contact with the Compliance Desk to address the issue and find a solution with the agent.

# BEING A RESPONSIBLE MEMBER OF SOCIETY





## Equal opportunity and respecting others

# We treat each other with respect.

### Facts

At Infront, our aim is to maintain a workplace that is professional and supportive of teamwork, mutual trust and respect because we know that our strength comes from our differences.

Therefore, we are an equal opportunity employer, and all employment decisions are based on business needs, job requirements, applicant skills and qualifications without regard for race, colour, gender, nationality, physical ability, age, religion, sexual orientation, gender identity, expression or any other aspect of diversity, citizenship, and parental status. We are committed to fostering a diverse and inclusive workplace.

### Context

A professional workplace requires a professional attitude and, as individuals and a company, we all are accountable for how we act both at the office and in any communication with fellow employees or external stakeholders. It is vital that we all understand how to recognise and define discrimination.

Infront has a zero-tolerance policy for any form of abuse, discrimination, harassment or bullying toward employees, business partners or others.

### How it impacts you

It is vital that you as an employee:

- Show respect, trust and inspire others.
- Place “we” over “me” and have fun as a team.
- Embrace diversity. Listen and be receptive to different points of view and do not discriminate anyone based on race, colour, gender, nationality, age, religion, sexual orientation, gender identity, expression, citizenship and parental status or other differentiators.
- Speak Up - if you witness bias, prejudice or mistreatment of any Infront employee, address it immediately or contact your local People Abteilung, your Compliance Desk or the **Speak Up Line** directly.

**ATTENTION: EQUAL OPPORTUNITY AND RESPECTING OTHERS**

## What shape does abuse take?

### **Bias**

To act or communicate with unaware personal stereotypes (“not meaning it”).

### **Discrimination**

To treat individuals differently based on elements of diversity.

### **Harassment**

To create an unpleasant or hostile situation especially by uninvited and unwelcomed verbal or physical conduct involving a work colleague, a group of colleagues or your line manager.

### **Mobbing/bullying**

Also known as “group bullying”, involves groups of people targeting a co-worker which can take various forms, including insults, constant criticism, threats, meaningless assignments, and exclusion.

### **Prejudice**

To act or communicate with awareness of personal stereotypes.

### **Disrespect**

A lack of esteem and recognition of professional capabilities extended to your work colleagues.



**EQUAL OPPORTUNITY AND RESPECTING OTHERS**

## What if?

**My line manager gets upset and loses her/his temper when there is a missed deadline or when things are not done up to quality standards. Would this be considered harassment?**

The line manager is creating an environment of fear and is not consistent with what we as a company want to portray to our people. In this case, for this to be considered harassment it highly depends on what was said.

It is best to share what was said and your concerns with your local People Department or Compliance Desk when such a situation occurs.





## Human rights

# We fully support the rights for all humans.

### Facts

Human rights are rights we have simply due to our existence - they are not granted by any state. These universal rights are for all of us, regardless of nationality, sex, sexual orientation, gender identity, expression, national or ethnic origin, colour, religion, language, or any other status. They range from the most fundamental - the right to life - to those that make life worth living, such as the right to food, education, work, health, and liberty.

The Universal Declaration of Human Rights (UDHR), adopted by the UN General Assembly in 1948, was the first legal document to set out fundamental human rights to be universally protected and it continues to be the foundation of all international human rights law. Its 30 articles provide the principles and building blocks of current and future human rights conventions, treaties, and other legal instruments.

### Context

As a company, we respect the rights of every individual and abide by the employment laws in the markets where we operate. We do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.

### How it impacts you

- Treat others with respect and dignity.
- Do not engage in human rights abuse or conduct business with those who do.
- Follow the employment laws where you work.
- Be alert to abuses and speak up if you see or suspect possible labour law or human rights violations.

## HUMAN RIGHTS

## What if?

**I saw a news article that says a contractor my colleague is considering for the delivery of a new LED system has been known to use child labour. I'm not involved in the decision, so is it my place to say anything?**

Yes. Selecting a business partner that has a history of engaging in human rights abuses is against Infront's values and could put our company at risk.

You should tell your colleague and/or the line manager what you know about the business partner to help ensure avoiding any violation of human rights.



## Environmental sustainability

# We care about society and the environment.

### Facts

Infront aims to run and grow its business in a sustainable and conscious manner. We are aware that the resilience of our business model depends not only on our economic performance but also on our capacity to integrate political, social, and environmental transitions into our long-term business planning.

Infront's Sustainability Report lays down Infront's focus areas along the lines of the UN Sustainable Development Goals. Environmental sustainability is one of five key focus areas within the report. Further, our Supplier Code of Conduct sets forth the framework of acceptable conduct Infront expects from its business partners in this regard.

### Context

Infront's business activities and operations can have an impact on the environment and are related to greenhouse gas emissions that negatively influence the climate. Several of Infront's Group companies, particularly those operating in the participation sports business, have already assessed the footprint of (selected) events, or have taken voluntary action to

reduce it. Infront's corporate carbon footprint reveals the biggest sources of our corporate emissions and is published in Infront's Sustainability Report. Climate change affects our business and the environment that we all live in. Infront therefore aims at gradually reducing its environmental footprint. We are also committed to collaborating with our partners to reduce environmental impacts along the sporting value chain.

### How it impacts you

You must act in accordance with all the laws and regulations within the countries you operate, including but not limited to obtaining and maintaining all the relevant environmental permits and suitably handling and disposing of hazardous materials. In addition, Infront encourages you to promote the environmentally friendly development of our products, solutions, and service delivery. We expect you to integrate environmental considerations in your business conduct, including your travel decisions, and to actively contribute to the reduction of our environmental footprint, considering energy usage, purchased materials or waste.



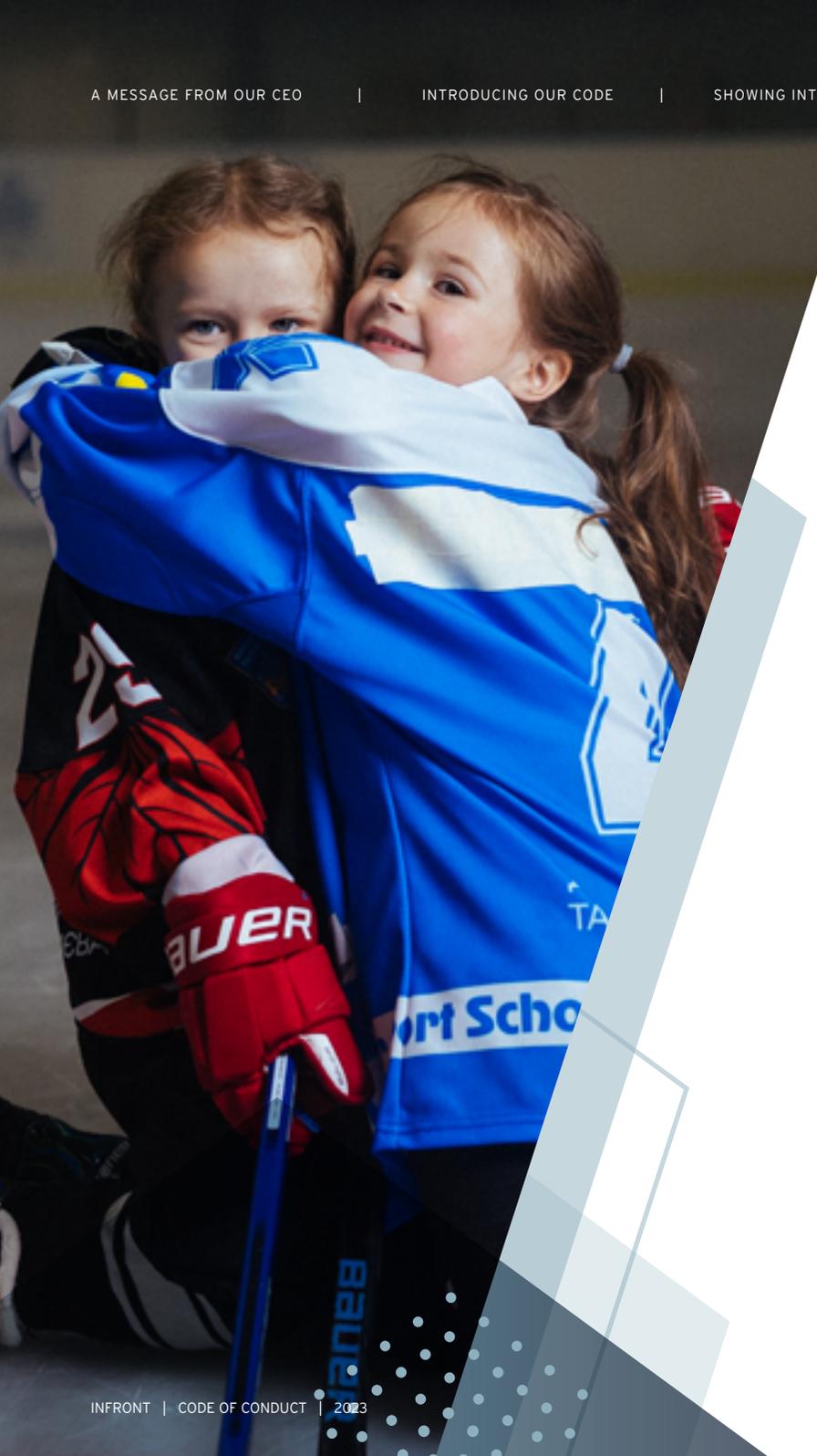
## ENVIRONMENTAL SUSTAINABILITY

### What if?

**I want to go on a business trip and there is the option of taking a train instead of a flight.**

In accordance with this Code and as laid out in Infront's Global Travel Policy, trains are to be preferred when the travel time is reasonable. When travelling longer distances, train travel has the lowest emissions per passenger kilometre ratio than any other means of transport.

Using a train instead of a domestic flight would reduce your emissions by around 84%. In addition, train rides usually can be used more efficiently for productivity purposes.



## Charitable donations, political and other contributions

# We give back. But we choose carefully.

### Facts

Charitable donations are voluntary third-party contributions, made in good faith to organisations officially certified for their charitable not-for-profit work. Charitable donations can be made in the form of a monetary contribution, a donation in kind or a contribution of voluntary employee working hours. As a responsible corporate member of society, we donate to social and humanitarian projects.

We donate to different institutions and avoid patterns of repeated donations to the same institution. In doing so, we ensure those charitable donations are not used as a substitute for bribery.

### Context

All donations must be transparent and centrally managed by our headquarters in Zug. This means that the recipient's identity and planned use of the donation must be clear and the reason and purpose for the donation must be justifiable.

Quasi-donations, meaning donations which appear to be compensation for a service but are substantially larger than the value of the service, are prohibited as violating the principles of transparency. Infront does not make contributions to any political campaign, political party, political candidate, or any of their affiliated organisations. Donations to sports federations and their affiliated organisations must be checked carefully and must never be misused as a "camouflaged" bribe (see section about bribery and corruption for more details).

### How it impacts you

The following donations are prohibited:

- Donations to individuals and profit-organisations.
- Donations paid on private accounts.
- Donations made in the interest of individual employees and not in the corporate interest of Infront.
- Donations to organisations that have goals which are not compatible with Infront's values.
- Donations that would damage Infront's reputation.

## CHARITABLE DONATIONS, POLITICAL AND OTHER CONTRIBUTIONS

### What if?

**I support a charity organisation in my free time and volunteer at their events. Do I have to get the permission from the Compliance Desk for such voluntary work?**

No, this does not fall under the scope of the Code, and you can support charity organisations in your free time as a private person as long as it does not conflict with your job at Infront or with the interests of Infront. In such a case, discuss the situation with your line manager.

**We sell starting packages for our mass participation events to charity organisations which then re-sell those packages for higher prices and sometimes with the obligation for the participant to fundraise certain amounts. Does this conflict with the Code?**

No, in this scenario we do not donate to any charity organisation ourselves, we just enable such organisations to fundraise money for their purpose. Consequently, this does not fall into the scope of the above section.



# PROTECTING WHAT IS ENTRUSTED TO US





## Our assets

# We're good stewards of our intellectual property and any physical, electronic and information assets.

## Facts

Our assets include everything that our company owns or uses to conduct business. Physical and electronic assets such as furniture, equipment, tools, inventory, computer hardware and software are provided in order for you to do your job. Occasional personal use (in accordance with local law and local internal policies) of assets such as phones, computers, email and the internet is permitted, but it shouldn't interfere with work (yours or anyone else's) and it shouldn't violate our policies or the law. Information is also a critical asset. Confidential information and intellectual property ("IP") represent the outcome of significant company investment and years of hard work.

## Context

Most of the information we create and use in our jobs is either intended for internal use or will be disclosed publicly only at a certain time and for a certain purpose. Confidential information can take many forms, including, business plans, agreements, databases, business partners lists (including contact details), research and more. Virtually all the information we generate belongs to Infront and is stored digitally in the Infront IT ecosystem. Information security is the practice of protecting the information in our

IT landscape by restricting any unauthorised or otherwise inappropriate access, disclosure, destruction, modification or copying of such information.

## How it impacts you

Each of us is entrusted with the care of these assets, so be proactive in safeguarding them from loss, damage, theft, waste, and improper use:

- Avoid using company assets for an outside business or other personal gain.
- Company assets should not be used for anything illegal, inappropriate or unethical (such as access to - or dissemination of - pornographic or offensive subject matter).
- Respect the assets of others and never knowingly damage or misappropriate the assets and IP rights of others.
- Protect the company's confidential information from inadvertent disclosure by never creating, accessing or using our confidential information in a public setting where it may be overheard or viewed.
- Protect confidential information from theft by only utilising company-provided tools and software and by creating and safeguarding passwords in accordance with our policies and standards.

## Maintaining accurate records

# Integrity in our recordkeeping inspires trust by clients, investors, and business partners.

## Facts

Almost every collection of information we create while performing our jobs - from emails reflecting financial or sales information to sales forecasts and presentations to formal documents and reports like accounting records and regulatory filings - is a company record.

Laws require us to be true, honest, and accurate in our financial records so that they appropriately reflect our business transactions. Maintaining financial integrity also reflects positively on our reputation and credibility.

## Context

Our records - and our recordkeeping - help us fulfil our financial commitments and pay our people. But they also provide a picture of our financial health. They keep us accountable to our shareholders, investors, business partners and employees and are the basis on which we make important strategic decisions. That's why records that are clear and complete and accurately reflect our business transactions are critical company assets.

## How it impacts you

Each of us has an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement, entering a CRM account, filing an expense report, or simply completing a time sheet, be honest, accurate and complete. Do not falsify or mischaracterise any record, account, or transaction.

## If you hear this, seek help!

- "Make the numbers work."
- "Hold that sale until next month so we can meet next quarter's target."
- "Pay the bill for our private lunch with the company credit card, no one will notice."

Hearing comments like these? Stop and seek help. If it sounds illegal or unethical, it probably is.



**MAINTAINING ACCURATE RECORDS**

**What if?**

**I don't work in finance or accounting. Is "financial integrity" my responsibility?**

**Yes.** Accuracy in recordkeeping isn't the job of one team or one department. Notwithstanding your role, you directly or indirectly contribute to the financial state of the company.

It's a responsibility we all share. From expense reports and benefits enrolment forms to CRM data and sales invoices – all of our everyday transactions must be accurate, complete and properly recorded.



# QUICKLINKS

# Quicklinks

- [Digital Compliance Platform](#)
- [Speak Up Line](#)
- [Gifts & Hospitality Policy](#)
- [Speak Up Policy](#)
- [Due Diligence Policy](#)
- [Conflict of Interest Policy](#)
- [Supplier Code of Conduct](#)
- [Data Protection Policy](#)
- [Q&A about competition and antitrust law](#)
- [Q&A about international sanctioning laws](#)

Topic	Description	Contact options
<b>Speak Up</b>	You have a concern, or you have witnessed a misconduct	<ul style="list-style-type: none"> <li>• Line Manager</li> <li>• Compliance Desk</li> <li>• People Department</li> <li>• Legal Department</li> <li>• <b>Speak Up Line</b></li> </ul>
<b>Business partner due diligence</b>	You are in discussion with a potential business partner that is domiciled in a sanctioned country	<ul style="list-style-type: none"> <li>• Compliance Desk</li> </ul>
<b>Business partner due diligence</b>	You want to initiate a cooperation with a new consultant	<ul style="list-style-type: none"> <li>• Submit a request on the <b>Digital Compliance Platform</b></li> <li>• Compliance Desk for clarifications</li> </ul>
<b>Business partner due diligence</b>	A business partner requires a payment to a third-party account	<ul style="list-style-type: none"> <li>• Compliance Desk</li> <li>• Treasury Department</li> </ul>
<b>Gifts &amp; hospitality</b>	You are invited to a concert and receive VIP tickets (value more than EUR 200)	<ul style="list-style-type: none"> <li>• Submit a G&amp;H request on the <b>Digital Compliance Platform</b></li> <li>• Compliance Desk for clarifications</li> </ul>
<b>Competition and antitrust law</b>	You want to initiate discussions about a joint bid or a backing agreement with potential competitors	<ul style="list-style-type: none"> <li>• Compliance Desk</li> <li>• Legal Department</li> </ul>
<b>Competition and antitrust law</b>	You plan to meet a competitor	<ul style="list-style-type: none"> <li>• Compliance Desk</li> </ul>
<b>Conflict of interest</b>	You anticipate a potential conflict of interest	<ul style="list-style-type: none"> <li>• Submit a request on the <b>Digital Compliance Platform</b></li> <li>• Line Manager</li> <li>• Compliance Desk</li> </ul>
<b>Privacy</b>	You want to sell personal data from B2Run participants to a sponsor	<ul style="list-style-type: none"> <li>• Data Protection Officer (if existing)</li> <li>• Legal Department</li> </ul>
<b>Privacy</b>	You realise you trapped into a cyber scam and confidential data was retrieved from your computer	<ul style="list-style-type: none"> <li>• IT Department</li> <li>• Legal Department</li> </ul>
<b>Equal opportunity and respect</b>	You do not feel respected or even bullied by your line manager	<ul style="list-style-type: none"> <li>• People Department</li> <li>• Compliance Desk</li> <li>• <b>Speak Up Line</b></li> </ul>
<b>Human rights</b>	You must chose a supplier for sports clothing as a supplier and you want to chose a supplier not engaged in human rights violations	<ul style="list-style-type: none"> <li>• Compliance Desk</li> </ul>
<b>Environmental sustainability</b>	You want to reduce the carbon footprint at your event	<ul style="list-style-type: none"> <li>• Communication Department</li> </ul>
<b>Charitable donations</b>	You would like Infront to donate to the foundation of a sports federation	<ul style="list-style-type: none"> <li>• Compliance Desk</li> <li>• Communication Department</li> </ul>

Document History						
Version	Author	Owner	Enactment Date <sup>1</sup>	Effective Date	Next Review Date	Comments/Changes
1.0EN	THO	THO	01.01.2007	01.01.2007		First Version
2.0EN	THO	THO	29.03.2012	01.04.2012		Introduction of Infront's compliance management system and complete review of the Code
3.0EN	BAL	THO	08.03.2023	01.06.2023	2027	Complete review
4.0EN						

<sup>1</sup> Meaning adopted by the Board of Directors

Our first Code was published in 2007 and was followed up in 2012. This version is an organic document and will continually be reviewed and updated to ensure we remain ahead of the curve in all our compliance efforts.

**Contact details:**

In case of questions, comments or concerns, please contact the Group Compliance Desk via [compliance@infrontsports.com](mailto:compliance@infrontsports.com).

