

CTS EVENTIM CODE OF CONDUCT

1 January 2025

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(GB)

The CTS EVENTIM Code of Conduct ('the Code') guides our actions and decisions within the CTS EVENTIM Group. This essential guideline applies to all employees of the CTS EVENTIM AG & Co. KGaA and all of its subsidiaries (hereinafter referred to as "EVENTIM"), no matter their role or location, and we're all responsible for following it.

The Code helps us navigate legal and ethical issues, ensuring our decisions reflect our values and comply with laws. Managers are key in promoting ethical behaviour, embodying our values, and ensuring their teams follow the Code.

We value open communication and encourage everyone to speak up about concerns or violations. The principles set out in the Code guide us in conducting our daily business.

Even one person's inappropriate behaviour can impact EVENTIM, so it's crucial we all uphold the Code and hold each other accountable. Accordingly, everyone must ensure that their behaviour does not harm EVENTIM's reputation. Violations will have consequences. To prevent issues, we seek advice and support from the appropriate internal partners to protect our company, values, and reputation.

We are committed to our values and strive to positively impact our stakeholders and the world. Suppliers should refer to the CTS EVENTIM Supplier Code of Conduct.

1 We Comply with Laws

At EVENTIM, strict adherence to international, national, and local laws and regulations is essential to our operations. This commitment guarantees that our business practices are not only legally compliant but also reflect high standards of ethical conduct. Understanding and abiding by applicable laws protect our company from legal risks and bolster our reputation as a trustworthy, law-abiding company. This includes adherence to all relevant economic sanctions and tax compliance regulations and ensuring that our financial and business practices do not contravene any imposed sanctions and are consistent with tax laws.

We are committed to high standards in accounting and financial reporting. We ensure that all financial records are accurate, complete, and timely, adhering to applicable accounting standards and regulatory requirements. We also comply with our statutory obligations as a listed company to publish price sensitive insider information in a timely manner. This commitment helps to maintain transparency and trust with our stakeholders, including shareholders, customers, and regulatory bodies.

Furthermore, we prevent money laundering activities. We ensure that business transactions are conducted in accordance with applicable anti-money laundering laws.

We treat all insider information with the utmost confidentiality and prohibit any trading of company's securities based on such information. Insider information is carefully managed to prevent any unfair advantage in the market.

Action: *Take personal initiative to stay informed about the latest regulations and legal standards affecting your work. It is your responsibility to ensure that your decisions and actions align with applicable law. Seek legal clarity independently when necessary to uphold this commitment.*

2 We Act with Integrity and Honesty

The principles of integrity and honesty are vital to our corporate ethos. These values influence our actions within and beyond the company, shaping our interactions with clients, partners, and the public. By adhering to these principles, we ensure that all business operations are conducted with integrity, which is essential for maintaining trust and credibility in the marketplace.

We expect our business partners to commit to integrity, respect for human rights, and compliance with legal and social standards. This includes adherence to the International Bill of Human Rights, ILO standards, and the UN Guiding Principles.

Our purchase and selection processes are not only competitive, but also reflect ethical considerations to ensure that all transactions reflect our values. We hold our suppliers to the same high standards, expecting them to adhere to our 'Supplier Code of Conduct' to ensure consistency and integrity across all our business relationships.

Action: *Maintain honesty and integrity in all your actions. Report dishonest activities or breaches of ethical standards through our established reporting channels. Regularly assess and ensure that interactions with business partners and suppliers meet our high ethical and legal standards, including human rights considerations.*

3 We Avoid Conflicts of Interest

Conflicts of interest pose a significant risk, potentially undermining trust and impacting our decision-making capabilities. We are committed to identifying, disclosing, and effectively managing conflicts of interest to prevent adverse effects on our business decisions and stakeholder relationships. Employees are expected to avoid situations where personal interests might conflict with their professional obligations.

Action: *Assess and disclose proactively personal or financial interests that may conflict with your duties to the company. Consult with your supervisor, HR or Compliance for advice on how to manage and resolve potential conflicts.*

4 We Prohibit Corruption and Bribery

EVENTIM upholds a zero-tolerance policy towards corruption and bribery. We prohibit all forms of corrupt practices, whether direct or indirect, ensuring that our business actions are conducted fairly and based on merit. This stance helps prevent any form of undue influence on our decision-making processes. In our interactions, particularly with public officials, we strictly adhere to limits set by our internal guidelines and applicable laws regarding gifts and invitations.

Our policies on sponsoring and donations are crafted to follow both the law and internal guidelines, emphasizing transparency and accountability. We focus on creating a positive societal impact and maintaining a favourable public perception, while explicitly prohibiting donations to political parties.

Action: *Reject offers that may be considered bribery and report them through our confidential channels. Ensure that business actions are conducted according to ethical practices and in line with applicable laws. Adhere to our guidelines concerning gifts, invitations, sponsoring, and donations, especially in actions that involve public officials. Participate in our mandatory training on corruption and anti-bribery.*

5 We Uphold Fair Competition

Fair competition is crucial for maintaining a healthy economic environment and fostering innovation. At EVENTIM, we comply with all applicable antitrust and competition laws to ensure that our business practices are fair and actively promote competition. This adherence not only supports a market environment where consumers benefit from fair prices and high-quality products, but also ensures that our operations do not unjustly hinder or eliminate competition. We strictly avoid any unlawful exchanges of sensitive market or competitive information with competitors and diligently ensure compliance with merger control regulations during cooperative arrangements and mergers and acquisitions (M&A) transactions.

Action: *Maintain vigilance to ensure that all your business practices align with antitrust laws and actively promote fair competition. Specifically, avoid discussing sensitive market information with competitors and ensure all cooperative arrangements and M&A activities are conducted in compliance with applicable antitrust regulations. Report any practices or behaviours observed within the company or among competitors that could potentially restrict competition to the legal department immediately.*

6 We Protect Confidentiality, Data and Intellectual Property Rights

At EVENTIM, protecting data confidentiality, integrity, and availability, is paramount in our operations. We adhere to strict information security standards and data protection laws, to ensure that all personal and sensitive information about employees, customers, suppliers, and other business partners is handled with the highest security and confidentiality. Our employees are expected to maintain security, keep software updated, and follow our security policies diligently.

In addition, we are equally committed to the protection of company assets, including intellectual property. We ensure that all forms of intellectual property, such as patents, trademarks, business methods, know-how, and other sensitive information, are adequately safeguarded against theft, misuse, and unauthorized disclosure.

Action: *Ensure the secure handling of all sensitive and personal information, as well as confidential business data and intellectual property. Remain vigilant in monitoring data security. Promptly report any security concerns to the IT Security team. Additionally, ensure that you handle all company assets responsibly and report any suspicious activity related to potential misuse or theft of these assets. Participate in our mandatory training sessions on these topics.*

7 We Foster Workplace Respect and Equality

We are committed to creating a workplace that respects diversity and supports equality. Our policies are designed to provide equal opportunities and to actively combat any form of discrimination or harassment. This commitment ensures a positive and inclusive workplace environment where all employees can thrive.

Importantly, all employees are hired, paid, and developed based on merit, which upholds our principles of fairness and equality across all company operations. In addition to these commitments, we prioritize occupational and workplace health and safety. We adhere to all relevant health and safety regulations and best practices to ensure that our work environments are safe and healthy for all employees.

Action: *Support and actively participate in initiatives that promote diversity and inclusion. Ensure that your decisions related to hiring, compensation, and professional development are based on merit and job-related criteria alone. Report any instances of discrimination or harassment immediately to help maintain a respectful and equitable workplace. Additionally, contribute to maintaining a safe work environment by following all health and safety guidelines and reporting any workplace hazards or incidents. Participate in health and safety training sessions to enhance your understanding of these critical areas.*

8 We Support Environmental Responsibility

Environmental responsibility is integral to our corporate strategy. We strive to minimize our environmental impact through efficient use of resources, waste reduction, and the adoption of sustainable practices. Our proactive approach to environmental stewardship, including a strong emphasis on environmental and climate protection, is crucial for sustainable business practices and the well-being of future generations. By prioritizing the health of our planet, we commit to continuous improvement in our environmental performance and to addressing the challenges posed by climate change.

Action: Engage actively in environmental sustainability efforts, recommend eco-friendly practices, and ensure your actions and operations comply with environmental policies. Support our initiatives to reduce carbon footprints and enhance climate resilience in your area of influence within the company. Educate yourself and your team about the impacts of environmental and climate changes and incorporate best practices for sustainability into daily operations.

9 We Encourage Speaking-Up

We encourage speaking up about wrongdoings, promoting a culture of integrity. Compliance with rules is mandatory, and misconduct is not tolerated and addressed promptly. You can report any suspected or actual unethical or illegal behaviour either by contacting your superior, your local HR department, the local Compliance Coordinator or by using our electronic whistleblowing system “CTS EVENTIM Compliance Helpline”.

Our whistleblowing system is critical for maintaining our high ethical standards and addressing any issues that could adversely affect our organization. This system allows to report unethical or illegal behaviour, anonymously if desired, and without fear of retaliation, ensuring that all concerns are addressed transparently and effectively.

Action: We prefer a direct and open personal dialogue. However, if you feel uncomfortable doing so, you can choose the CTS EVENTIM Compliance Helpline, which can also be used to make anonymous reports.

10 We Enforce Accountability

Accountability is essential for the effectiveness of our Code of Conduct. We ensure that all reports of misconduct are investigated thoroughly, and appropriate actions are taken against those who violate our standards.

As part of reinforcing accountability, our general management and leadership play a crucial role. Leaders are expected to exemplify the highest standards of ethical behaviour, demonstrating transparency, fairness, and integrity in all their actions. They are responsible for guiding their teams, making ethical decisions, and ensuring that the principles of this Code are integrated into everyday business practices. This approach underscores our commitment to ethical behaviour and the consequences for violating our guidelines.

Action: Always adhere to ethical behaviour and encourage your peers to do the same. Use our reporting channels to hold yourself and others accountable, ensuring that our high standards are maintained across the organization. As a leader, take proactive steps to mentor and guide your team members, fostering a culture of responsibility and ethical integrity that aligns with our corporate values.

Our Code of Conduct is a binding framework ensuring integrity and compliance with EVENTIM's policies. Employees must adhere to this Code to prevent regulatory breaches and protect the company. Violations of law or policies are investigated rigorously, with potential disciplinary or legal consequences for offenders.

Employees should discuss any concerns or suspicions of violations with their supervisor, the local HR department, or the local Compliance Coordinator. Reports can also be made through the CTS EVENTIM Whistleblowing System, which allows for anonymous submissions and is designed to handle serious regulatory violations confidentially and impartially.

Serious Regulatory Violations include breaches that significantly impact our ethical standards or the company's reputation and financial interests. Managers are expected to act as role models, promptly reporting any suspected serious violations.

The Whistleblowing System aims to safeguard the company, whistleblowers, and all associated parties. It ensures anonymity for whistleblowers, prohibits retaliation against them, and maintains the presumption of innocence for the accused until proven otherwise. Misuse of the system is not tolerated and will be disciplined.

Violations concerning our Suppliers' Code, including significant risks or breaches involving human rights and environmental standards, can also be reported.

You can access the Whistleblower System through the following channels:

Postal address

CTS EVENTIM AG & Co. KGaA
Group Compliance
Contrescarpe 75a
28195 Bremen
Germany

Phone 0421-3666 0

Email: compliance@eventim.de

Online reporting channel (this channel can be used for making anonymous reports)

CTS EVENTIM Compliance Helpline
eu.deloitte-halo.com/CTSEVENTIMComplianceHelpline/

Further information on the CTS EVENTIM Whistleblowing System, and the relevant external reporting channel (if applicable) is available on the internet at

<https://corporate.eventim.de/en/company/compliance/>