

Exhibition Services & Contractors Association (ESCA) Employee Code of Conduct

The Code establishes a fundamental set of standards and defines how we conduct our business with the highest integrity and ethics. It applies to all individuals employed by or engaged to provide services to ESCA, including employees, officers, temporary and casual employees, independent contractors and consultants. Although employment by ESCA is subject to the terms and conditions established by your local business entity, you are also required to abide by the global standards set forth in this Code.

It is the responsibility of each individual mentioned above to apply common sense, together with your own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code. You should not hesitate to ask questions, voice concerns or request clarity on gray areas about whether any conduct may violate the Code.

Your Role

Your role and personal commitment to integrity and ethical behavior is critical to living our values. It is imperative you put integrity and ethics first by:

- Acting ethically and with integrity in all business dealings
- Knowing and following the Code, ESCA policies and procedures and the law
- Reporting all alleged, potential or actual violations of the Code, policies and the law
- Fully cooperating with investigations and answering all questions truthfully

Consequences for Violating the Code

Because how we conduct business is so critical to our organization, we take all violations of our Code seriously. Individuals who work for/with ESCA, who violate our Code or any of our policies will be subject to disciplinary action, up to and including termination.

Individuals who work for/with ESCA who knowingly make a false allegation to management or deliberately provide false information will be subject to discipline. Individuals who work for/with ESCA who refuse to cooperate in an investigation or fail to take appropriate action after receiving a report of a suspected violation will also be subject to disciplinary action.

Asking Questions and Reporting Concerns

ESCA is committed to conducting business with the highest standards of ethics, honesty and integrity. To continue to do so, we need to know and understand whether problems exist so we may resolve them promptly. We will review and investigate every allegation as appropriate and, if justified, will implement disciplinary actions or other remedies. So, you are expected to promptly report any concerns you in good faith believe may be a violation of the Code. Options for reporting concerns or allegations of misconduct include:

- ESCA Executive Director or and member of the Executive Board

Commitment to Non-Retaliation

Any Individuals who work for/with ESCA who reports an alleged violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for making a report in good faith. Retaliation against anyone who provides information or otherwise assists in

an investigation regarding any conduct the employee believes in good faith constitutes a violation of applicable laws or regulations, our Code or ESCA's policies and procedures is prohibited and will, in itself, be treated as a violation of our Code.

Diversity, Inclusion and Non-Discrimination

ESCA actively creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences. As we continue to grow, embracing diversity in every aspect of our business is vital to our long-term success. ESCA affirms the principle of equal employment opportunity without regard to any protected characteristic, including but not limited to:

- Race
- Religious creed
- National origin / ancestry
- Color
- Sex or gender
- Sexual orientation
- Gender identity or expression
- Age
- Mental or physical disability or medical condition
- Pregnancy
- Marital status
- Military and protected veteran status
- Genetic information
- Political affiliation
- Any other characteristic protected under federal or state law or local ordinance

ESCA does not tolerate discrimination in any aspect of the employment relationship, from recruitment and hiring, through performance evaluations, compensation, and promotions, to the end of your employment relationship with ESCA.

We base employment-related decisions strictly on individual ability, performance, experience, and company and business need. We avoid actions influenced by personal relationships and discriminatory practices of any kind.

Our goal is to compensate our employees – with wages, salaries, and other benefits – in relation to their responsibilities, performance, and experience. ESCA is also committed to adhering to wage and hour as well as minimum-age guidelines provided by applicable laws. In turn, employees must accurately report their hours of work and paid time off in accordance with ESCA policies.

Harassment

ESCA is committed to providing a work environment free of all forms of harassment. Our goal is to create a place where all team members feel safe, welcome and heard. For this to happen, all employees must treat each other with mutual respect and dignity. Harassment is prohibited in any form: physical, verbal and non-verbal. Harassment is prohibited by ESCA and the law.

Although “harassment” frequently refers to sexual harassment, workplace harassment may also include harassment based on a person’s race, religious creed, national origin/ancestry, color, sex

or gender, sexual orientation, gender identity or expression, age, mental or physical disability or medical condition, pregnancy, marital status, genetic information, political affiliation, military and protected veteran status, or any other characteristic protected under federal or state law or local ordinance.

You must report all instances of harassment, whether you are being harassed yourself or have witnessed harassment of another employee or individual at our workplace, to the Executive Director of ESCA or member of the Executive Board. Your report will remain confidential to the greatest extent possible and retaliation is not tolerated for any report made in good faith.

Professional Conduct

You are always expected to conduct yourself in a professional, respectful manner consistent with ESCA's values and culture of integrity. Unprofessional conduct or behavior at the workplace or while representing ESCA at another worksite that negatively affects the company's business interests or reputation and/or violates law is prohibited.

Safety and Security

Threats or acts of violence against you, temporary employees, independent contractors, members, suppliers, or other persons and/or property will not be tolerated. Immediately report potential threats or acts of violence to the Executive Director of ESCA or member of the Executive Board. In case of an emergency, contact local law enforcement.

Substance Abuse

ESCA requires employees to work free from the influence of any substance, including drugs and alcohol, that may prevent them from conducting work activities safely and effectively.

Theft

Theft of any amount will not be tolerated. No Individuals who work for/with ESCA may commit theft, fraud or embezzlement, or misuse company labor or property. This extends to activities such as falsifying expense reports and misrepresenting information for personal gain.

Employee Information Privacy

ESCA respects the privacy of Individuals who work for/with ESCA. We will collect and handle personal employee information only for business reasons consistent with applicable laws. Access to personal employee information is limited only to those who have a legal right to view the information, and then only on a need-to-know basis for the performance of their job. Those who are responsible for personal information are advised on a regular basis of their duty to protect this information.

Proprietary and Confidential Information

In carrying out ESCA's business, employees, officers and the Board of Directors often learn confidential or proprietary information about our company, its members, prospective members, or other third parties. Employees, officers and the Board of Directors must maintain the confidentiality of all information entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information includes, among other things, any non-public

information concerning ESCA, including its businesses, financial performance, results or prospects, and any nonpublic information provided by a third party with the expectation the information will be kept confidential and used solely for the business purpose for which it was conveyed.

Protecting Member / Third-Party Information

Keeping member information secure and using it appropriately is a top priority for our company. We must safeguard any confidential information members, or third parties share with us. We must also ensure such information is used only for the reasons for which the information was gathered, unless further use is allowed by law. Member or third-party information includes such things as name, address, phone numbers, financial information, etc. We do not disclose confidential or proprietary information about a third party without their written approval unless legally required to do so (under a court-issued subpoena, for example).

Proper Use of Company Resources

ESCA provides an array of resources to employees so they may perform their jobs. This includes physical assets such as equipment, supplies, inventory, materials and cash. It also includes information and technology resources such as e-mail, computers, computer applications, networks, the internet, the intranet, cell and smart phones, other wireless communication devices, telephones and voice mail systems.

Inappropriate or illegal use of these resources will result in disciplinary action, up to and including termination of employment.

Improper use includes:

- Hacking
- Excessive use of technology resources for personal purposes
- Pirating software or video / audio files
- Soliciting
- Sending inappropriate or harassing e-mail
- Accessing inappropriate web sites (such as those advocating hate, violence, sexually explicit material or promoting illegal activities)
- Distributing confidential, proprietary or trade secret information outside the company

ESCA reserves the right to monitor and inspect, without notice, the use of company resources.

Examples of misusing company resources?

- Use of our company facilities for personal gain
- The excessive use of company resources for personal purposes, such as surfing the internet
- Excessive, non-business related use of social media
- The taking of office supplies or equipment for personal consumption
- The personal use of our company vehicles without express authorization
- The unauthorized copying of computer software programs
- Excessive use of our company-issued credit card(s) for personal purchases

Electronic media such as smart phones, tablets, data storage units or thumb drives are provided for employees to perform their job responsibilities. Individuals who work for/with ESCA have the

responsibility to protect these systems and the data that is contained on them from misuse, improper access, damage, and theft. Keep in mind, even when use of ESCA's electronic media for limited personal purposes is permitted, such use is not private. Anything sent or received using our company's electronic media may be reviewed by ESCA and others at its discretion and direction.

Manage Records Properly

Our records are our corporate memory, containing data and information critical to the continuity of our business. Records consist of all forms of information created or received by ESCA, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mail, electronic files stored on disk, tape or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our company or our business activities. All records are the property of ESCA. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. We do not destroy official company documents or records before the retention time expires, but do destroy documents when they no longer have useful business purpose.

Social Media

At ESCA, we encourage communication among our employees, members, partners and others – and web blogs, social networks, discussion forums, wikis, video and other social media can be a great way to stimulate conversation and discussion. It is particularly important to remember the following:

- The Code, ESCA's Social Media Policy, and other ESCA policies apply to your online conduct and activity just as much as they apply to your offline behavior
- Do not use social media for confidential, substantive or direct business communications with members
- Respect others' intellectual property rights, including copyrights and privacy/publicity rights, particularly when using photographs or video content
- Unless you are an official ESCA spokesperson, you are not authorized to speak on behalf of ESCA or represent that you do
- Do not make any politically oriented commentary or statements using any of ESCA's social media accounts or platforms
- When using your personal social media account(s) to discuss ESCA-related topics, identify yourself as an ESCA employee, and make it clear your opinions are your own and do not necessarily reflect the views of ESCA
- Do not disclose any confidential information through any social media platform
- Do not make abusive, objectionable or inflammatory posts

Media Policy

In an age of 24-hour news cycles where information flows instantaneously, managing the reputation and protecting the brand of ESCA among its key audiences is vital to the organization's success. As such, it is critical that our communications with external audiences are managed in a coordinated way with ESCA's spokesperson.

- Individuals who work for/with ESCA should not communicate externally about ESCA prospects, members, performance policies, or disclose unpublished sensitive information, without appropriate approval from senior management.

- All requests from the media should be documented accurately (name, outlet, phone and/or e-mail address) and passed on immediately to the personnel with communications responsibility. This includes formal requests for interviews and quotes as well as inquiries, and includes all media – TV/radio, newspapers, magazines, local/national, trade media, blogs and internet sites.
- Only authorized staff may speak with the media with prior approval. No Individuals who work for/with ESCA should speak or accept an appointment to speak with the media without the approval and advice of senior management or communications staff.

Protecting Intellectual Property

Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others.

Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose ESCA and individuals to severe sanctions. Our company forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business with reputable members and third parties involved in legitimate business activities and transactions.

Anti-Corruption / Anti-Bribery

The United States and many other countries have laws to prohibit bribery, kickbacks, and other improper payments. No ESCA employee, officer, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage. The Foreign Corrupt Practices Act and other U.S. and international laws prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining or directing of business. We expect all employees, officers, agents, and independent contractors acting on behalf of ESCA to strictly abide by these laws. "Anything of value" is very broadly defined and can include such things as:

- Cash
- Gifts
- Meals

- Entertainment
- Travel and lodging
- Personal services
- Charitable donations
- Business opportunities
- Favors
- Offers of employment

Facilitation payments are generally requested in connection with obtaining ordinary licenses, work permits, processing of visas and other similar customary governmental services. Facilitating payments of a reasonable and customary amount paid to lower-level government officials in foreign countries to perform non-discretionary functions or services that they are obligated to perform are not illegal under United States law as long as payments are customary in a particular country and are the only feasible way to obtain government services or action to which ESCA is legally entitled. However, such facilitating payments may not be legal under local law. ESCA can pay for bona fide business expenses and certain gifts for third parties, but only if done without corrupt intent.

Business Courtesies You May Extend

Furnishing meals, refreshments, entertainment, and event access in conjunction with business discussions with nongovernment personnel may be appropriate as long as the offering of such courtesies does not violate any policies of the recipient's organization, any contractual agreement with a third party or member. You are responsible for familiarizing yourself with any such standards, agreements, and policies and for complying with them. ESCA prohibits giving anything of value (including charitable donations or sponsorship of events), directly or indirectly, to any private individual, firm, or entity as a means of improperly inducing business. Employees who seek or approve expenditures for meals, refreshments, or entertainment must use discretion and care to ensure these events are reasonable and modest in cost, not lavish or extravagant, justified by a legitimate business purpose, and not offered improperly to influence the recipients' business judgment.

ESCA's standards and the applicable laws for dealing with government employees and employees of state-owned enterprises are more stringent than standards for private sector company employees. In dealing with government employees and officials, it is our general policy that nothing of value will be given to such individuals with limited exceptions as discussed with senior management. Contact Human Resources or senior management if you have any questions about your activities and interactions with the government. In any case, business courtesies must be small enough not to appear to influence the judgment of the recipient, secure unfair preferential treatment, or gain an improper advantage. A final test of appropriate business courtesies, even if allowed under the law, is whether public disclosure would be embarrassing to ESCA or the recipient.

Business Courtesies You May Accept

You may accept certain gifts from third parties and ESCA can pay for bona fide business expenses and certain gifts for third parties, but only if done without corrupt intent and according to applicable anti-corruption laws.

Generally, we should limit ourselves to gifts, meals, transportation, or entertainment of nominal value. In particular, the following types of gifts and entertainment may never be accepted, regardless of the value:

- Cash or cash equivalents (i.e. gift cards)
- Any gifts given or accepted, or any entertainment provided during a bidding process
- Any gifts that are or could be illegal
- Any gifts or entertainment that is solicited
- Contributions to personal charitable causes

The following are not considered gifts and entertainment and may be accepted as long as such acceptance is permitted under applicable law:

- Gifts that are promotional/branded company giveaways of nominal value
- Mementos or other similar awards provided or paid for by vendors or service providers as recognition for service on a particular matter
- Perishable gifts that are impractical to return and are of nominal value if they are distributed to ESCA's employees for consumption on ESCA's premises
- Business meals, at which the giver is present and business discussions take place or the meal is contiguous to a legitimate business discussion, are permissible if infrequent and the value of the meal is reasonable as judged by local standards
- Local travel to a vendor's place of business as long as the value of the travel is reasonable and the vendor's place of business cannot be reached by major forms of transportation

You should never accept any gift or entertainment if you feel it would affect your ability to act in ESCA's best interests. Before accepting any gift or entertainment, you should ask yourself:

- Will the acceptance reflect poorly on ESCA?
- Is there a valid business reason to accept the gift or entertainment, and does the acceptance accomplish a legitimate business purpose?
- Will the acceptance create a negative impression in the minds of our co-workers or the public?
- Is the acceptance consistent with good business practices?
- Is the value reasonable, given the nature of the event or other context within which the gift, favor or the like is given?
- Is the expense and frequency of the activity reasonable?

Selection and Use of Third Parties / Procurement

To create an environment where our suppliers, contractors, and consultants have an incentive to work with ESCA, they must be confident they will be treated in an ethical manner. We offer fair opportunities for prospective third parties to compete for our business. The manner in which we select our suppliers and the character of the suppliers we select reflect on the way we conduct business.

Government Contracting

When doing business with federal, state, or local governments, we must ensure all statements and representation to government procurement officials are accurate and truthful, including costs and other financial data. If your assignment directly involves the government or if you are responsible for someone working with the government on behalf of ESCA, be alert to the special rules and regulations applicable to the government. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should

be avoided when dealing with government officials and employees. Payments, gifts, or other favors given to a government official or employee are strictly prohibited as it may appear to be a means of influence or a bribe. Failure to avoid these activities may expose the government agency, the government employee, our company, and you to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state, or local government entity must be in accordance with our company policy.

Avoiding Conflicts of Interest

We have an obligation to make sound business decisions in the best interests of ESCA without the influence of personal interests or gain. Our company requires you to avoid any conflict, or even the appearance of a conflict, between your personal interests and the interests of our company. A conflict exists when your interests, duties, obligations or activities, or those of a family member, are, or may be, in conflict or incompatible with the interests of ESCA.

Conflicts of interest expose our personal judgment and that of our company to increased scrutiny and criticism and can undermine our credibility and the trust others place in us. Should any business or personal conflict of interest arise, or even appear to arise, you should disclose it immediately to your manager or Human Resources for review.

In some instances, disclosure may not be sufficient and we may require the conduct be stopped or actions taken be reversed where possible. As it is impossible to describe every potential conflict, we rely on you to exercise sound judgment, to seek advice when appropriate, and to adhere to the highest standards of integrity.

Immigration Laws

You are required to ensure you, and any employees who report to you, comply with all applicable immigration laws. At all times, ESCA employees must possess proper work authorization for the country they are working in. If you travel internationally on business, you are responsible for obtaining the appropriate visa, if necessary, before entering a host country. Visa requirements apply to all ESCA employees who travel outside of their home countries for business purposes or who work on projects or international assignments outside their home countries for any duration. Personal passports are not acceptable forms of work authorizations. ESCA also prohibits you from allowing contractors or other employees to work on a project without the proper authorization or documentation.

Political Activities and Contributions

You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. These activities, however, must not be conducted on company time or involve the use of any company resources such as telephones, computers or supplies. You may not make or commit to political contributions on behalf of ESCA.

Human Rights

We are committed to upholding fundamental human rights and believe all human beings around the world should be treated with dignity, fairness, and respect. Our company will engage suppliers and direct contractors who demonstrate a serious commitment to the health and safety of their workers, and operate in compliance with human rights laws. ESCA does not use or condone the

use of slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working conditions, and supports our products being free of the use of conflict minerals.

Environment, Health and Safety

ESCA is committed to conducting its business operations in a manner that protects the health and safety of its employees, visitors, contractors, members, and the public. We strive to provide solutions to reduce the environmental impact of our products and services, while actively advocating our sustainability message to clients and industry leaders. We are mindful of how our company interacts with the local and global environment.